



County of Santa Cruz

PLANNING DEPARTMENT

701 OCEAN STREET, 4TH FLOOR, SANTA CRUZ, CA 95060
(831) 454-2580 FAX: (831) 454-2131 TDD: (831) 454-2123
KATHLEEN MOLLOY PREVISICH, PLANNING DIRECTOR
www.sccoplanning.com

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ENVIRONMENTAL REVIEW INITIAL STUDY

Date: March 30, 2011

Application Number: Not Applicable

Staff Planner: Matthew Johnston

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: County of Santa Cruz and
City of Scotts Valley

APN(s): Multiple Parcels (3,606 parcels)

OWNER: Multiple Property Owners

SUPERVISORAL DISTRICT: District 5
and small portion of District 1

PROJECT LOCATION:

The proposed Interim Programmatic Habitat Conservation Plan (IPHCP) and Incidental Take Permits (ITPs) would apply to Covered Activities on 3,606 parcels located in the Sandhills region of unincorporated Santa Cruz County, California and the City of Scotts Valley, California. The ten Project Units are located between Highway 17 and Scotts Valley Drive on the east, and Graham Hill Road and Highway 9 on the west (See Figures 1 and 2).

SUMMARY PROJECT DESCRIPTION:

The proposed project entails the U.S. Fish and Wildlife Service (Service) issuing ITPs under the Endangered Species Act of 1973 (16 U.S.C 1531-1544, 87 Stat. 884), as amended (Act) to the County of Santa Cruz (the County) and the City of Scotts Valley (the City) for the incidental take of the Mount Hermon June beetle from Covered Activities identified in the IPHCP. The proposed project also entails the County and the City accepting the implementation and enforcement responsibilities under the ITPs, via approval by the County Board of Supervisors and the City Council, respectively. The IPHCP covers certain eligible small development projects (e.g., single family dwelling, garage, remodel, deck, swimming pool, etc.) proposed in densely developed residential neighborhoods that support habitat for the Mount Hermon June beetle and Ben Lomond spineflower, referred to as Covered Species (See Figure 2). Once the ITPs are issued by the Service and accepted by the County and City, the local jurisdictions could extend take authorization to individual landowners located within designated Project Units, who qualify, based on the eligibility criteria set forth in the IPHCP, and who sign a Certificate of Inclusion.

The ITPs issued pursuant to this IPHCP will expire when the Sandhills Regional HCP process is completed, when the total amount of habitat disturbance authorized under the ITPs reaches 139 acres, or when 5 years have elapsed since issuance of the ITPs, whichever occurs first. However, the IPHCP makes provisions for permit renewal. Projects conducted under the City and County's ITPs (i.e., Covered Activities) must be completed before the ITPs expire, if they are not renewed.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: All of the following potential environmental impacts are evaluated in this Initial Study. Categories that are marked have been analyzed in greater detail based on project specific information.

- | | |
|---|---|
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Hydrology/Water Supply/Water Quality | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Greenhouse Gas Emissions |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Visual Resources & Aesthetics | <input type="checkbox"/> Utilities & Service Systems |
| <input type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Mandatory Findings of Significance |

DISCRETIONARY APPROVAL(S) BEING CONSIDERED:

- | | |
|---|--|
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Coastal Development Permit |
| <input type="checkbox"/> Land Division | <input type="checkbox"/> Grading Permit |
| <input type="checkbox"/> Rezoning | <input type="checkbox"/> Riparian Exception |
| <input type="checkbox"/> Development Permit | <input checked="" type="checkbox"/> Other: Acceptance of Terms and Responsibilities of Incidental Take Permits |

NON-LOCAL APPROVALS

Other agencies that must issue permits or authorizations:

The U.S. Fish and Wildlife Service (the Service) would issue the ITPs under section 10(a)(1)(B) of the Endangered Species Act, which would authorize take of the Mount Hermon June beetle resulting from certain eligible small residential development projects. To support this action, the Service is preparing an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) to address the environmental effects of issuance of the ITPs in association with the IPHCP for the Sandhills region.

DETERMINATION: (To be completed by the lead agency)
On the basis of this initial evaluation:

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

Matthew Johnston
Environmental Coordinator

Date

II. BACKGROUND INFORMATION:

EXISTING SITE CONDITIONS

See Table 1.

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

See Table 1.

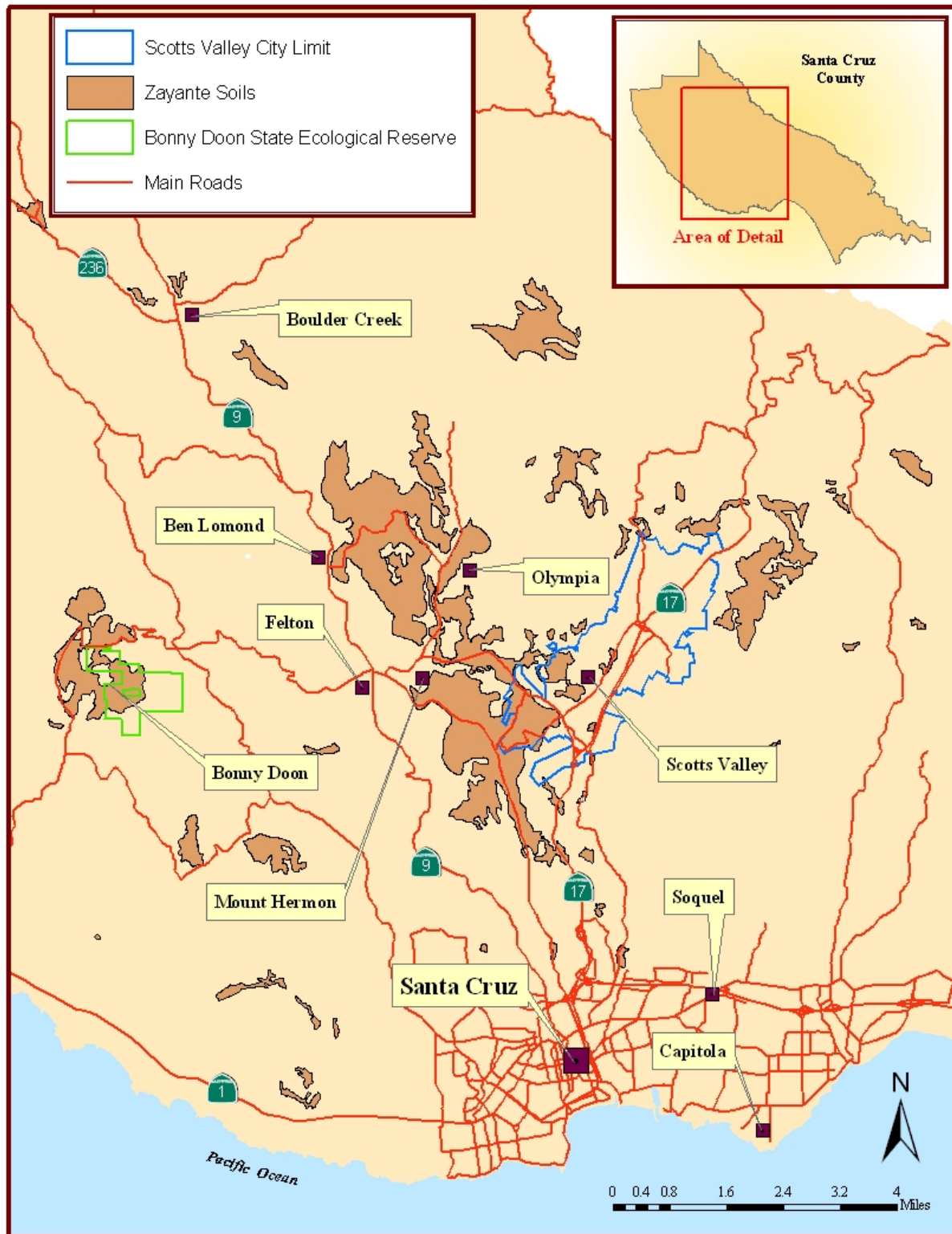
SERVICES

See Table 1.

PLANNING POLICIES

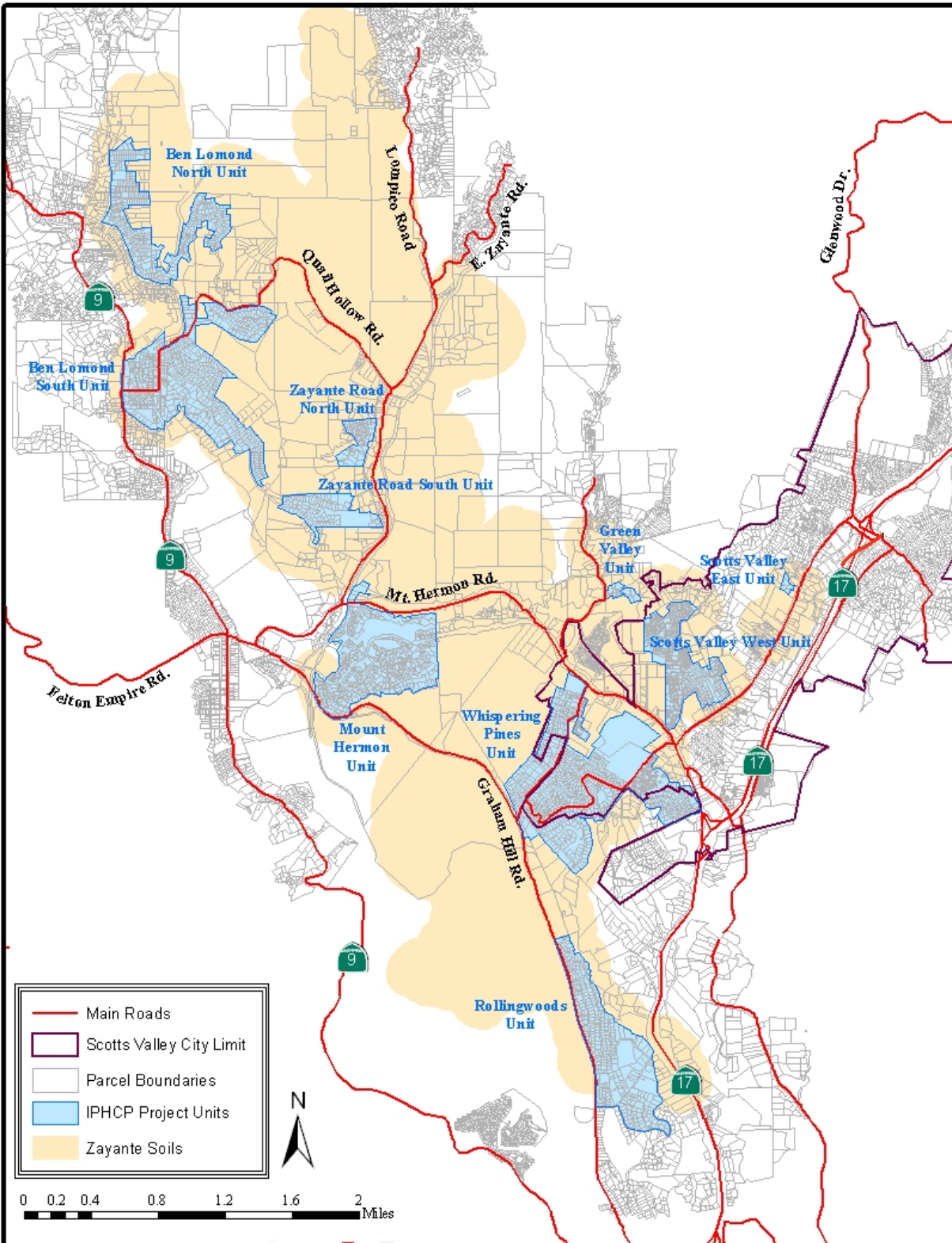
See Table 1.

Figure 1. Zayante soils series and the general locations of Sandhills habitat, Santa Cruz County, California.



Source: U.S. Fish and Wildlife Service, County of Santa Cruz, and City of Scotts Valley. 2011. *Sandhills Interim Programmatic Habitat Conservation Plan*. January.

Figure 2. Project Units Covered under the IPHCP, Santa Cruz County, California.



Source: U.S. Fish and Wildlife Service, County of Santa Cruz, and City of Scotts Valley. 2011. *Sandhills Interim Programmatic Habitat Conservation Plan*. January.

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

Table 1 provides information related to site conditions for the ten Project Units identified in the IPHCP.

Table 1: Existing Conditions within IPHCP Project Units

EXISTING CONDITIONS ¹	IPHCP PROJECT UNITS										
	Rollingwoods	Whispering Pines (County)	Whispering Pines (City)	Scotts Valley East	Scotts Valley West	Green Valley	Mount Hermon	Zayante Road North	Zayante Road South	Ben Lomond North	Ben Lomond South
Geology and Soils											
Fault Zone	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped
Landslide	Yes-small portion	Not mapped	Yes-portion	Not mapped	Yes-small portion	Not mapped	Yes-portion	Not mapped	Yes-small portion	Not mapped	Yes-small portion
Liquefaction	Yes-small portion with low potential	Yes-small portion with moderate potential	Yes-moderate to high potential	Not mapped	Yes-small portion with moderate potential	Yes-moderate potential	Not mapped	Not mapped	Not mapped	Not mapped	Yes-portion with moderate potential
Slope 0-30% 31-100%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%	0-30%
Erosion Potential ²	Slight to Moderate	Slight to Moderate / Small portion of area High to Very High	Slight to Moderate / Small portion of area High	Slight to Moderate / Very High	Slight to Moderate / Small portion of area High	Slight to Moderate	Slight to Moderate / Very High	Slight to Moderate / High / Very High	Slight to Moderate / Small portion of area Very High	Slight to Moderate / Small portion of area High or Very High	Slight to Moderate / Small portion of area High or Very High
Shrink-Swell Potential ²	Low to Moderate/Small portion of area High	Low to Moderate	Low to Moderate	Low to Moderate	Low to Moderate	Low/ Small portion of area Moderate to High	Low to Moderate	Low to Moderate	Low to Moderate	Low to Moderate	Low to Moderate
Septic Limitations ²	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions	Severe under certain conditions
Hydrology, Water Supply, and Water Quality											
Floodplain	Yes-small portion	Not mapped	Yes-small portion	Not mapped	Yes-small portion	Not mapped	Yes-small portion	Yes-small portion	Yes-small portion	Yes-small portion	Yes-small portion
Nearby Watercourse	Powder Mill Creek	Carbonera Creek	Carbonera Creek	Carbonera Creek	Carbonera Creek	Bean Creek	Bean Creek and Zayante Creek	Zayante Creek	Zayante Creek	Newell Creek	San Lorenzo River

EXISTING CONDITIONS ¹	IPHCP PROJECT UNITS										
	Rollingwoods	Whispering Pines (County)	Whispering Pines (City)	Scotts Valley East	Scotts Valley West	Green Valley	Mount Hermon	Zayante Road North	Zayante Road South	Ben Lomond North	Ben Lomond South
Distance to Watercourse	460 feet (140 meters)	705 feet (215 meters)	705 feet (215 meters)	395 feet (120 meters)	970 feet (295 meters)	On-site	On-site	80 feet (25 meters)	80 feet (25 meters)	On-site	On-site
Groundwater Supply	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Water Supply Watershed	Yes-portion	Yes-portion	Yes-portion	Not mapped	Yes-portion	Yes	Yes	Yes	Yes	Yes	Yes
Groundwater Recharge	Yes	Yes	Yes	Yes	Yes-portion	Yes-portion	Yes-portion	Yes	Yes-portion	Yes-portion	Yes-portion
Biological Resources											
Vegetation	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities	Remnant patches of Sandhills communities
Biologically Sensitive Habitat	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Energy and Natural Resources											
Timber and Agriculture	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Yes-small portion	Not mapped	Not mapped	Not mapped	Not mapped
Agricultural Resource	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped
Mineral Resources	Not mapped	Not mapped	MRZ-1, MRZ-2, and MRZ-3 ³	MRZ-3 ³	MRZ-1, MRZ-2, and MRZ-3 ³	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped
Electrical Power Lines	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Solar Access	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Solar Orientation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

EXISTING CONDITIONS ¹	IPHCP PROJECT UNITS											
	Rollingwoods	Whispering Pines (County)	Whispering Pines (City)	Scotts Valley East	Scotts Valley West	Green Valley	Mount Hermon	Zayante Road North	Zayante Road South	Ben Lomond North	Ben Lomond South	
Visual Resources and Aesthetics												
Scenic Corridor	Scenic Road – Route 17 from Route 1 to Santa Clara County ⁴	Scenic Road - Lockwood Lane ³	Scenic Road - Lockwood Lane. Important Vista ³	Not mapped ³ or identified ⁴	Scenic Road - Bean Creek Road. Adjacent to Prominent Ridge ³	None identified ⁴	Scenic Road – Mt. Hermon Road from Scotts Valley city limit to Graham Hill Road ⁴	None identified ⁴	None identified ⁴	None identified ⁴	None identified ⁴	Scenic Road – Route 9 from Route 1 to Santa Clara County ⁴
Cultural Resources												
Historic Resources ⁵	None identified	None identified	None identified	None identified	None identified	None identified	Mt. Hermon Conference Center Auditorium	None identified	None identified	Hammond Home, Shorey House	None identified	
Archaeological Resources	Yes-potential throughout much of unit	Yes, potential throughout unit	Low, High and Moderate Sensitivity Zones ³	Low, High and Moderate Sensitivity Zones ³	Low, High and Moderate Sensitivity Zones ³	Yes-potential throughout unit	Yes-potential throughout much of unit	Yes-potential throughout much of unit	Yes-potential within portion of unit	Yes-potential throughout much of unit	Yes-potential throughout portion of unit	
Paleontological Resources	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	Not mapped	
Hazards and Hazardous Materials												
Hazardous Materials ⁶	None identified	None identified	None identified	None identified	None identified	None identified	None identified	None identified	None identified	None identified	One parcel (APN 072-284-17)	
Fire Hazard	Yes-portion	Yes-portion	Yes-portion	Not mapped	Yes-portion	Not mapped	Yes-portion	Yes-portion	Yes-portion	Yes-portion	Yes-portion	
Noise												
Noise Constraint	N/A	Not mapped ³	Not mapped ³	Not mapped ³	Not mapped ³	N/A	N/A	N/A	N/A	N/A	N/A	
Public Services and Utilities												
Fire Protection	Scotts Valley FPD	Scotts Valley FPD	Scotts Valley FPD	Scotts Valley FPD	Scotts Valley FPD	Scotts Valley FPD	Felton FPD	Zayante FPD	Zayante FPD	Ben Lomond FPD	Ben Lomond FPD	
School District	Scotts Valley	Scotts Valley	Scotts Valley	Scotts Valley	Scotts Valley	Scotts Valley	San Lorenzo Valley	San Lorenzo Valley	San Lorenzo Valley	San Lorenzo Valley	San Lorenzo Valley	
Sewage Disposal	CSA 10 & Private Septic	Scotts Valley Sewer &	Scotts Valley Sewer	Scotts Valley Sewer	Scotts Valley Sewer	Private Septic	Mt. Hermon Sewage	Private Septic	Private Septic	Private Septic	Private Septic	

EXISTING CONDITIONS ¹	IPHCP PROJECT UNITS										
	Rollingwoods	Whispering Pines (County)	Whispering Pines (City)	Scotts Valley East	Scotts Valley West	Green Valley	Mount Hermon	Zayante Road North	Zayante Road South	Ben Lomond North	Ben Lomond South
		Private Septic					System & Private Septic				
Drainage District	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5	Santa Cruz County Flood Control and Conservation District 5
Project Access	Graham Hill Rd., Sims Rd., Hwy. 17	Graham Hill Rd.	Graham Hill Rd., Mt. Hermon Rd., Hwy. 17	Scotts Valley Dr., Hwy. 17	Mt. Hermon Rd., Scotts Valley Dr., Hwy. 17	Mt. Hermon Rd., Lockhart Gulch Rd., Hwy. 17	Graham Hill Rd., Mt. Hermon Rd., Hwy. 17	East Zayante Rd., Mt. Hermon Rd.	East Zayante Rd., Mt. Hermon Rd.	Brookside Ave., Hwy. 9	Quail Hollow Rd., Hwy. 9
Water Supply District	City of Santa Cruz	San Lorenzo Valley	San Lorenzo Valley and Scotts Valley	Scotts Valley	Scotts Valley	Scotts Valley	None/Mt. Hermon Water System	San Lorenzo Valley	San Lorenzo Valley	San Lorenzo Valley	San Lorenzo Valley
Land Use, Population, and Housing											
Parcel Size	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre	≤1.5 acre
Existing Land Use	residential	residential	residential	residential	residential	residential	residential	residential	residential	residential	residential
Jurisdiction	County	County	City	City	City	County	County	County	County	County	County
Zone District	Residential SF	Residential SF / Park	Low, Medium, Medium High, and High Density Residential / Residential Estate ⁷	Low Density Residential ⁷	Medium, Medium High, and High Density Residential ⁷	Residential SF	Residential SF / Park	Residential SF	Residential SF Special Use	Residential SF / Agriculture Residential	Residential SF / Agriculture Residential
General Plan	Residential-Urban Very Low Density	Residential-Urban Very Low Density and Parks and Recreation	Low, Medium, Medium High, and High Density Residential / Residential	Low Density Residential ⁸	Medium, Medium High, and High Density Residential ⁸	Residential - Rural	Residential-Suburban	Residential - Rural	Residential - Rural	Residential - Rural and Suburban	Residential - Rural and Suburban

EXISTING CONDITIONS ¹	IPHCP PROJECT UNITS										
	Rollingwoods	Whispering Pines (County)	Whispering Pines (City)	Scotts Valley East	Scotts Valley West	Green Valley	Mount Hermon	Zayante Road North	Zayante Road South	Ben Lomond North	Ben Lomond South
			Estate ⁸								
Urban Service Line	Inside	Inside	Inside	Inside	Inside	Outside	Outside	Outside	Outside	Outside	Outside
Coastal Zone	Outside	Outside	Outside	Outside	Outside	Outside	Outside	Outside	Outside	Outside	Outside

Notes:

1. Information presented in this table was developed from the County of Santa Cruz Geographical Information System (GIS) mapping, unless otherwise noted. The County GIS maps have not been ground truthed at a parcel level, and actual conditions on any given parcel may differ from the GIS information.
2. Information contained in Soil Survey of Santa Cruz County, California.
3. Information derived from constraint maps contained in City of Scotts Valley 1994 General Plan, updated December 1999.
4. Information contained in 1994 Santa Cruz County General Plan and Local Coastal Program.
5. Information contained in Adopted County Historic Inventory.
6. Information contained in Santa Cruz County Site Mitigation List, January 2009.
7. Information provided in City of Scotts Valley Zoning Map, March 2007.

8. Information contained in City of Scotts Valley General Plan Map, 2001.

PROJECT BACKGROUND:

The proposed IPHCP and ITPs would apply to certain eligible small development projects on parcels within ten designated Project Units located within a portion of the Sandhills region in the County and the City. The ten Project Units are located between Highway 17 and Scotts Valley Drive on the east and Graham Hill Road and Highway 9 on the west (See Figures 1 and 2). Attachment 1, to this Initial Study also provides parcel maps for each of the ten Project Units.

The Service designated the Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*) and Mount Hermon June beetle (*Polyphylla barbata*) as federally endangered in 1994 and 1997, respectively, under the Act. These species are associated with sandy soils in the Zayante series. The Zayante soil series supports habitat known as the Zayante or Santa Cruz Sandhills (Sandhills) found in and near the communities of Mount Hermon, Scotts Valley, Felton, Olympia, and Ben Lomond in Santa Cruz County, California (Figure 1). The Mount Hermon June beetle and the Ben Lomond spineflower occur on additional islands of Zayante sands in the vicinity of the community of Bonny Doon in Santa Cruz County. Both species are threatened by sand mining, urban development, invasion of nonnative plant species, intensive recreation, and fire suppression.

Numerous private landowners in the City and County are interested in applying under the Act for a section 10(a)(1)(B) permit to allow incidental take of the Mount Hermon June beetle. These landowners have proposed projects on sites that are likely occupied by Mount Hermon June beetles and Ben Lomond spineflower. The Service has recommended that the City and County work together to apply for incidental take permits (ITPs) and develop a regional programmatic habitat conservation plan (HCP) for the Sandhills. This would provide conservation benefits for these species and other rare species associated with this habitat. The regional HCP would streamline the local, state, and Federal permitting processes associated with these species and their habitat. However, the City and County will likely need at least several years to complete a regional HCP.

Due to the time required to prepare a regional HCP, the IPHCP for these species was developed for use on small development projects proposed in areas with existing, dense residential development. The IPHCP was developed in an attempt to provide an additional option for landowners that would be more efficient and effective than the traditional permitting process. Landowners will still have the option of developing their own HCP and seeking individual incidental take permits, or waiting until the County and City have developed and implemented a regional HCP.

DETAILED PROJECT DESCRIPTION:

Project Overview

The proposed project entails the Service issuing ITPs to the County and the City for the incidental take of the Mount Hermon June beetle from certain eligible small development projects identified in the proposed IPHCP, called Covered Activities. The proposed project also entails the County and the City accepting the following implementation and enforcement responsibilities under the ITPs, via approval by the County Board of Supervisors and the City Council, respectively:

- Overseeing implementation of avoidance and minimization measures required by the IPHCP and ITPs.
- Monitoring landowner compliance with the terms of each Certificate of Inclusion, the IPHCP, and ITPs.
- Creating and maintaining a database to track the areal extent of Zayante soils that is disturbed or modified by the Covered Activities, as authorized under the ITPs.
- Training planning department staff to review permit applications for compliance with the IPHCP.
- Enforcing the terms and conditions of the IPHCP and ITPs.
- Submitting annual reports to the Service.

Once the ITPs are issued by the Service and accepted by the County and City, take authorization could be extended to individual landowners located within designated Project Units, who qualify, based on the eligibility criteria set forth in the IPHCP, and who sign a Certificate of Inclusion.

The IPHCP is intended to be used for small development projects (*e.g.*, single family dwelling, garage, remodel, deck, swimming pool, etc.) proposed in areas with existing, dense residential development that are likely occupied by the Mount Hermon June beetle and Ben Lomond spineflower (See Figure 2). The eligibility criteria for coverage under the IPHCP include the following:

- Project is residential.
- Project is located on a parcel that is 1.5 acres or less in size.
- Project would result in ground disturbance of Zayante soils.
- Development envelope for the project, when combined with the development envelope for any project previously implemented on the same parcel using the IPHCP and the ITP, will not exceed 15,000 square feet (0.34 acres).¹

¹ For the purposes of the IPHCP, development envelope is defined as any portion of the project site that will undergo ground disturbance such as the following activities: grading (excavation and/or fill); land clearing; building; paving; installation of landscaping; or deposition of refuse or debris in relation to a discretionary or building permit.

- Proposed development is a project that requires a City or County discretionary or building permit that involves ground disturbance. Examples include: single family dwelling, guest cottage (or accessory dwelling unit), attached or detached garage; shed; storage building, room addition, remodels that involve ground disturbance, septic system installations and upgrades.

Projects that meet these eligibility requirements can be covered by the IPHCP and ITPs, and are thereby the proposed “Covered Activities” referred to in the IPHCP.

Ten Project Units within the IPHCP boundary were identified within the communities of Ben Lomond, Felton, Mount Hermon, and Scotts Valley. These Project Units range in size from 3.2 to 373 acres and encompass a total of 1,693.2 acres, including roads, common areas, and a substantial amount of existing development. Units include parcels in the vicinity of Rollingwoods, the Whispering Pines neighborhood, east and west Scotts Valley, Green Valley, Mount Hermon, Zayante Road, and Ben Lomond. Within these units, a maximum of 139 acres of Sandhills habitat could be developed or otherwise disturbed under the IPHCP. This acreage figure represents 5 percent of the estimated total amount (2,800 acres) of Sandhills habitat with documented occurrences of the Mount Hermon June beetle, as of 2004.

The IPHCP will be in effect for 5 years following the issuance of the requested ITPs, until the regional HCP is completed by the City and County, or the limit of habitat modification of 139 acres of Zayante soils is reached, whichever occurs first. However, the IPHCP makes provisions for permit renewal, if necessary, without the issuance of a new permit. This can occur if the biological circumstances and other pertinent factors affecting the Mount Hermon June beetle and Ben Lomond spineflower within the Project Units are not substantially different than those described in the IPHCP. This process could allow for the extension of the permit if the limit of habitat modification of 139 acres of Zayante soils is not reached within the 5-year time frame.

Operating Conservation Program

The IPHCP’s Operating Conservation Program is intended to achieve its biological goals and objectives and to ensure that the impacts of Covered Activities on the Mount Hermon June beetle and Ben Lomond spineflower are minimized and mitigated to the maximum extent practicable. The biological goals and objectives of the IPHCP are presented in Table 2 and the minimization and mitigation measures are further described below. Monitoring and reporting components of the program are also covered.

Minimization Measures

The IPHCP will allow many landowners to proceed with development projects in areas where on-site avoidance of habitat for the Mount Hermon June beetle and Ben Lomond spineflower is not feasible. In such cases, landowners will first be required to minimize habitat loss and disturbance via the implementation of the following required minimization measures, which are detailed more specifically in the IPHCP and in Section III.C, Biological Resources, of this document:

- Avoid impacts to native Sandhills plants to the greatest extent feasible, consistent with the purpose of the Covered Activity;
- Minimize construction-related ground disturbance during the growing season of the Ben Lomond spineflower and adult flight period of the Mount Hermon June beetle (May 15 through August 15);
- If scheduling ground disturbance to avoid the May 15 to August 15 time frame is not possible during construction, cover recently disturbed areas each evening during that period;
- Minimize landscaping elements that degrade habitat, as determined by the City or County and as consistent with the Covered Activity; and
- Minimize use of exterior night lighting that attracts insects during the flight period of the Mount Hermon June beetle (May 15 through August 15).

Table 2: IPHCP Biological Goals and Objectives

Goal	Goal/Objective Detail
1	Minimize take of the Mount Hermon June beetle and adverse effects to the Ben Lomond spineflower within the Project Units.
	<i>Objective 1.1. Avoid disturbance of Sandhills habitat whenever feasible, and when avoidance is infeasible, minimize disturbance to Sandhills habitat.</i>
	<i>Objective 1.2. Minimize ground-disturbing activities during the growing season of the Ben Lomond spineflower and adult flight period of the Mount Hermon June beetle (May 15 – August 15).</i>
	<i>Objective 1.3. Minimize removal of native Sandhills plant species.</i>
	<i>Objective 1.4. Minimize landscaping with turf grass, weed matting, aggregate, and mulch.</i>
	<i>Objective 1.5. Minimize night lighting during the flight season of the Mount Hermon June beetle.</i>
2	Protect habitat for the Mount Hermon June beetle and Ben Lomond spineflower at an off-site location of high long-term conservation value to the species.
	<i>Objective 2.1. Provide funds to protect, manage, and monitor habitat for the Mount Hermon June beetle and Ben Lomond spineflower at a Service-approved conservation bank(s).</i>

Mitigation Measures

In addition to implementing the above minimization measures, the impacts of Covered Activities must be mitigated and compensated for through the implementation of the following mitigation measures, which are detailed more specifically in the IPHCP and in Section III.C, Biological Resources, of this document:

- To the maximum extent feasible, require that any revegetation or landscaping activities associated with Covered Activities are conducted using locally-derived plant species native to the Sandhills;
- Prior to beginning any ground-disturbing activities, the impacts of Covered Activities must be mitigated in one of the following ways:
 1. Secure conservation credits for the Mount Hermon June beetle at the Zayante Sandhills Conservation Bank; or

2. Secure conservation credits for the Mount Hermon June beetle at another Service-approved conservation bank, which also has an Operating Agreement with the County if the parcel is within the County's jurisdiction.

The mitigation ratio for Covered Activities will be 1 to 1 in terms of the area of disturbance envelope to the number of conservation credits of mitigation responsibility (i.e., a landowner with a project that has a disturbance envelope of 5,000 square feet will be required to mitigate by securing 5,000 square feet of conservation credits for the Mount Hermon June beetle). Unless there is another Service-approved conservation bank, revenue from the sale of these conservation credits will go toward the purchase price and management of the Service-approved Ben Lomond Sandhills Preserve of the Zayante Sandhills Conservation Bank, which is comprised of 22.8 acres of high quality Sandhills habitat, including 22.4 acres of prime habitat for the Mount Hermon June beetle. More specifically, qualifying landowners who participate through a Certificate of Inclusion would pay a "mitigation fee" that the landowners (or the Applicants on behalf of the landowners) will use to purchase credits, commensurate with the amount of impact by the individual project. The Zayante Sandhills Conservation Bank will use the mitigation fees to provide long term management for the Covered Species in the preserve, which is owned and managed by the bank.

Monitoring and Reporting

Monitoring will be conducted to track compliance with the terms and conditions of the IPHCP, Implementing Agreement, and permits. There are three types of monitoring that will be performed: (1) compliance monitoring to track the permit holder's compliance with the requirements specified in the IPHCP, Implementing Agreement, and permits; (2) effects monitoring to track the impacts of the Covered Activities on the Covered Species; and (3) effectiveness monitoring to track the progress of the conservation strategy in meeting the biological goals and objectives of the IPHCP. Monitoring will provide information for making adaptive management decisions.

For each Covered Activity, the appropriate local jurisdiction (i.e., City or County) would fill out a compliance monitoring report. For projects implemented over the course of two or more years, the City or County will prepare and submit annual monitoring reports until the Covered Activities are completed. In order for the Service to accurately assess take levels and determine if the biological goals and objectives of the IPHCP are being met, each of the compliance monitoring reports must include updated information on the proposed project and extent of Zayante soils disturbed, photographs, and information on adherence to the minimization and mitigation measures outlined in this IPHCP.

The City and County will provide feedback to each participating landowner as necessary to ensure compliance with the IPHCP and the ITPs. The City and County will compile the individual compliance monitoring reports prepared during each calendar year, summarize the information in the reports, and provide an annual summary report to the Service. The Service may prepare a brief report to the City and the County assessing the status of the conservation program including the effectiveness of minimization measures and the success of off-site mitigation.

County and City Responsibilities under the ITP

The City and County would receive the ITPs based on the IPHCP, and would therefore be responsible for complying with both the ITPs and the IPHCP. A detailed description of how the IPHCP would be implemented is provided in the Implementing Agreement (IPHCP Appendix H); the Implementing Agreement would govern implementation of the IPHCP. In general, however, the City and County would implement the IPHCP by integrating the requirements of the IPHCP into the City's and the County's discretionary and building permit programs.

The planning department of the City and the planning department of the County would assume the day-to-day responsibilities for implementation. As landowners submit applications for discretionary and building permits, each planning department would determine whether the proposed project is within a Project Unit and whether it is eligible for coverage under its' ITP. If the proposed project is within a Project Unit and would disturb ground by grading or other means, the planning department would notify the landowner that the proposed project may impact Zayante soils and may require an ITP from the Service. If the project is eligible for coverage under the IPHCP and the pursuant ITPs, the planning department would also explain the requirements for coverage and ensure that the landowner's application adheres to the IPHCP and the ITPs. If the landowner submits a complete application, including a signed Certificate of Inclusion, and has otherwise complied with all relevant terms of the IPHCP, as determined by the City or County, the City or County may extend coverage under its' ITP to the project. The project would then be a Covered Activity within the context of the IPHCP and incidental take resulting from the project would be authorized by either the City or County ITP.

According to the proposed IPHCP, the City and the County would establish application requirements and procedures for Covered Activities as described in Table 3 below.

Table 3: Application Requirements and Procedures

STEP	PROCEDURE
1	<p>Determine if the proposed project is within an IPHCP Project Unit.</p> <p>The landowner should review the maps provided in Appendix B of the IPHCP.</p> <ul style="list-style-type: none"> a. If the parcel lies within 1 of the 10 Project Units, proceed to step 2. b. If the parcel lies outside the boundaries of the 10 Project Units, the project site may still harbor Zayante soils and/or the Mount Hermon June beetle, Zayante band-winged grasshopper, Ben Lomond spineflower, or Ben Lomond wallflower. The City or County will notify the landowner that he or she should contact the Service to determine if the proposed project may take the Mount Hermon June beetle and if an individual ITP may be necessary. This step will help ensure the landowner is not in violation of section 9 of the Act for a project that is otherwise a lawful activity.
2	<p>Determine if the proposed project will disturb Zayante soils.</p> <p>Most projects within the IPHCP Project Units will occur on Zayante soils, which support Mount Hermon June beetle habitat. However, due to the imprecision of soils maps and the buffer that was applied using a Geographic Information System (GIS), some parcels within the IPHCP Project Units may not contain Zayante soils. Landowners who are uncertain as to whether their project will indeed impact Zayante soils can have their project area evaluated by a qualified individual from, or recommended by, the County, City,</p>

	or Service. A list of personnel qualified to conduct these evaluations will be available from the City, County, or Service. If a written evaluation from a qualified individual concludes that the project site does not contain Zayante soils, and the proposed project is not likely to result in take of Mount Hermon June beetles, the landowner does not need to obtain incidental take coverage under the IPHCP. If the proposed project will disturb Zayante soils, the landowner must proceed to step 3.
3	<p>Complete checklist of eligibility requirements.</p> <p>The landowner must provide information to the City or County that demonstrates their eligibility to be covered by the IPHCP and ITP. The landowner should use the template "Sandhills IPHCP Eligibility Checklist" in Appendix E of the IPHCP. If all requirements are met, proceed to step 4. If all requirements are not met and the proposed project is not eligible for coverage under the IPHCP and ITP, the City or County will recommend that the landowner contact the Service for information about individual incidental take permits.</p>
4	<p>Complete and Sign a Certificate of Inclusion.</p> <p>The landowner must submit a signed Certificate of Inclusion with all necessary documentation in order to proceed. A template Certificate of Inclusion is provided in Appendix C of the IPHCP. To comply with the IPHCP, the landowner must submit the following documentation as part of their discretionary or building application submittal to the appropriate local jurisdiction (City or County):</p> <ol style="list-style-type: none"> 1. Certificate of Inclusion; 2. Sandhills IPHCP Eligibility Checklist; 3. City or County Discretionary or Building Application; and 4. Project Plans (including development envelope).
5	<p>Submit Proof of Mitigation</p> <p>Prior to issuance of a discretionary or building permit from the City or County, the landowner or conservation bank must submit a Conservation Credit Sales Receipt.</p>

Service Responsibilities under the ITP

The Service will be responsible for providing timely advice and participation in consultations with the City and County under the IPHCP.

III. ENVIRONMENTAL REVIEW CHECKLIST

INTRODUCTION TO ANALYSIS

This section of the Initial Study contains the Environmental Review Checklist. The purpose of this checklist is to determine whether the proposed implementation of the ITPs and IPHCP could potentially result in a "significant effect on the environment" according to CEQA. CEQA defines a *significant effect on the environment* as a "substantial, or potentially substantial, adverse change in the environment" (PRC Div. 13 21068). State CEQA Guidelines Section 15382 describes *adverse change* as an "adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The proposed project evaluated in this Initial Study is the issuance of the ITPs to the County and City for the incidental take of the federally listed Mount Hermon June beetle

and the implementation of the IPHCP's operating conservation program. This conservation program defines specific minimization and compensatory mitigation measures that would address the potential incidental take associated with Covered Activities in the Planning Units on both the Mount Hermon June beetle and the Ben Lomon spineflower (Covered Species). Currently, the Service advises all private landowners proposing activities that may result in injury or mortality of federally listed animals to prepare an individual HCP and apply for an incidental take permit. The IPHCP and associated ITPs are being developed in an attempt to provide an additional, interim option for landowners pursuing certain small projects in defined Project Units that may support the Covered Species.

IPHCP COVERED ACTIVITIES

As indicated above, the IPHCP and ITPs are intended to address the potential incidental take of Covered Species that may result from Covered Activities in the Project Units. However, the issuance of the ITPs would not result in the authorization or approval of any specific development projects or Covered Activities. All future eligible Covered Activities would proceed through the normal discretionary or building permit review and approval processes of the County or City. Individual landowners within the Project Units that pursue development permits for certain small projects during the ITP permit period would have to request coverage under either the County or City ITP and the County or City would have to extend such coverage.

Covered Activities constitute development and growth that is already allowed under the general plans of the County and City. The County and City general plan land use designations and zoning would not change with the ITPs and therefore the ITPs would not change (either reduce or increase) the amount of residential development already allowed pursuant to local land use controls. In other words, regardless of whether the ITPs are issued, the same amount of residential development could ultimately occur in the Project Units as is currently allowed under the County and City general plans. Additionally, the ITPs would not change the location of future residential development.

Given that the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this Initial Study provides a summary of existing County and City policies, programs, and regulations that are in place to address the potential environmental effects of all new growth and development in the Project Units, including that associated with the Covered Activities. It is assumed that Covered Activities within the Project Units would occur consistent with the relevant general plan and local regulations. It should also be noted that for Covered Activities that require discretionary approvals, subsequent compliance with CEQA for individual projects would continue to be required as part of the discretionary approval process.

IPHCP MINIMIZATION AND MITIGATION MEASURES

As indicated above, the approval of the IPHCP and issuance of the ITPs would not result in the authorization of specific Covered Activities. Rather, the IPHCP and the ITPs

are being prepared to more effectively and efficiently address the potential incidental take of Covered Species associated with Covered Activities, as compared to the traditional property-by-property permitting process. Therefore, while the IPHCP and ITPs will not result in the approval of any Covered Activities, they will dictate, in part, how that growth and development occurs via the implementation of various elements of the IPHCP, including the minimization and mitigation measures for addressing the biological effects on Covered Species. As a result, this section of the Initial Study analyzes:

- (1) whether the issuance of the ITPs and implementation of the various elements of the IPHCP (e.g., the minimization and compensatory mitigation measures of the operating conservation program), would adequately address the adverse effects on the Covered Species that could occur with the Covered Activities and associated habitat removal allowed under the IPHCP and ITPs (see Response to C-1 below);
- (2) whether the implementation of the IPHCP minimization and mitigation measures would result in any potentially significant environmental effects (see responses throughout the Environmental Review Checklist); and
- (3) whether the IPHCP minimization and mitigation measures would conform with relevant County and City plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect (see Response to C-6 below).

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

A. GEOLOGY AND SOILS

Would the project:

1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - A. 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.

A. 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project Units are not located within or adjacent to a county or State mapped fault zone (see Section II, Table 1), therefore the potential for ground surface rupture is low in these units. However, the Project Units are likely to be subject to strong seismic shaking. Additionally, liquefaction and landslide potential does exist in some limited locations within the Project Units, as identified in the County's liquefaction and landslide mapping (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to geologic hazards that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Future residential projects implemented as allowed under the County and City general

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

plans would be designed in accordance with the latest version of the California Building Code, as applicable, which should minimize the hazards of seismic shaking and liquefaction. Further, County General Plan policies 6.1.4 and 6.1.5 and County Code Chapter 16.10, Geologic Hazards, identify the need for geologic hazards assessments and/or reports for new development, if warranted, to assure that appropriate safeguards are incorporated into project plans. City General Plan policies SP-489 and SA-490 also identify the need for geotechnical and/or geologic investigations for projects in known or suspected geologic hazard areas. Per Policy SP-487, the City also uses the County's liquefaction and landslide maps to assess geotechnical hazards within their planning area.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in any potentially significant seismic-related impacts, as these measures would not change or otherwise affect seismic conditions on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

See Response A-1 above, for a discussion of existing County and City policies, programs, and regulations pertaining to geologic hazards that are in place to address growth and development in the IPHCP Project Units.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in potentially significant impacts related to soil instability. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would reduce the overall amount of ground disturbance, as compared to existing conditions. To the extent that ground disturbance could exacerbate some soil instability conditions, such as landslide, the IPHCP should reduce such effects. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. Develop land with a slope exceeding 30%? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Based on the County GIS information, none of the subject parcels are known to be located in areas that exceed 30% slope (see Section II, Table 1). However, if projects

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

are proposed on parcels that have slopes greater than 30%, County and City policies and ordinances pertaining to development in such areas would apply.

IPHCP COVERED ACTIVITIES

See Response A-1 above, for a discussion of existing County and City policies, programs, and regulations pertaining to geologic hazards that are in place to address growth and development in the IPHCP Project Units.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in potentially significant impacts related to slope stability. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would reduce the overall amount of ground disturbance, as compared to existing conditions. To the extent that ground disturbance could exacerbate slope instability, the IPHCP should reduce such effects. Therefore, the impact is *less than significant*.

4. Result in substantial soil erosion or the loss of topsoil?

Zayante soils predominate within the Project Units, which have slight to moderate erosion potential. Small isolated areas do exist with high or very high erosion potential (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to soil erosion and sedimentation that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Some potential for erosion and associated siltation exists during the construction phase of future Covered Activities located in the Project Units. However, this potential would be minimized, as best management practices and standard erosion controls would be a required condition of future project approvals. In accordance with County General Plan Policy 6.3.4 and County Code Chapter 16.22, Erosion Control, a project must have an approved Erosion Control Plan prior to approval of a grading or building permit, which would specify detailed erosion and sedimentation control measures. The plan would include provisions for disturbed areas to be planted with ground cover and to be maintained to minimize surface erosion. City General Plan Policy OSA-353 and Chapter 15.06, Excavation, Grading, Erosion and Sediment Control Regulations of the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Scotts Valley Municipal Code also specify requirements for erosion control. In particular, this Chapter sets forth rules, regulations and minimum standards to control excavation, grading, erosion, and sediment, and it requires control of all existing and potential conditions of accelerated erosion as part of the issuance of grading permits.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program, would not result in potentially significant impacts related to soil erosion. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and one of the IPHCP minimization measures would further reduce the overall amount of ground disturbance, by requiring the avoidance of impacts to native Sandhills plants to the greatest extent feasible. Another minimization measure calls for ground-disturbing activities to be minimized between May 15 and August 15, which constitutes the majority of the dry season. If winter grading is allowed by the County or the City in the Project Units it would be for a limited area and time period. Additional erosion-control measures would also be required per County and City erosion control regulations (see discussion above). As a result, soil erosion and associated siltation should not be increased with the implementation of the IPHCP minimization and mitigation measures. Therefore, the impact is *less than significant*.

- 5. Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial risks to life or property?

Most of the soil types located in the Project Units have low to moderate shrink-swell potential. There are a few small, isolated areas that contain soils with high shrink-swell potential (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to geologic and soils hazards that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

It is unlikely that development in the Project Units subject to the ITPs would experience substantial risk caused by expansive soils. If expansive soils are present on a given parcel, County Code Chapter 16.10, Geologic Hazards, identifies the need for geotechnical or other engineering investigations and reports when a hazard or

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

foundation constraint requiring further investigation is identified. This requirement is intended to assure that appropriate safeguards are incorporated into project plans. City General Plan policies SP-489 and SA-490 also identify the need for geotechnical and/or geologic investigations for projects in known or suspected geologic hazard areas. In addition, the California Building Code (CBC) requires soils reports for structures to determine whether expansive soils exist and, if so, appropriate features are incorporated into the design of the structure (CBC 1802.3.2, 1805.8).

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program, would not result in any potentially significant impacts related to expansive soils, as these measures would not change or otherwise affect expansive soil conditions on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 6. Place sewage disposal systems in areas dependent upon soils incapable of adequately supporting the use of septic tanks, leach fields, or alternative waste water disposal systems where sewers are not available? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Sewer service is provided to parcels located in some of the Project Units by County Service Area 10, Scotts Valley Sewer, or Mt. Hermon Sewage. However, private septic systems are relied on in many of the Project Units. All of the soils in the Project Units have soils with severe septic limitations under certain conditions, including moderate slopes, shallow soils, and/or soils with permeability issues (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to sewer and septic systems that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Given that private septic systems are relied on in many of the Project Units, it is expected that future projects covered under the ITPs would result in some new private septic systems. Where septic systems are proposed, County Code Chapter 7.38, Sewage Disposal, requires that a permit be obtained from the County Environmental Health Services. As part of this permitting process, lot size, lot location, soil conditions,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

and other factors are evaluated to ensure that site conditions are appropriate to support such a system. Additionally, Chapter 13.08, Sewage Disposal System Regulations of the Scotts Valley Municipal Code provide for similar permitting requirements.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program, would not result in any potentially significant impacts related to septic systems, as these measures would not change or otherwise affect the installation or operation of such systems on parcels in the Project Units. Therefore, the impact is *less than significant*.

7. Result in coastal cliff erosion?

None of the parcels are located in proximity to coastal bluffs (see Section II, Table 1). Therefore, the potential for coastal cliff erosion does not exist for the project.

B. HYDROLOGY, WATER SUPPLY, AND WATER QUALITY

Would the project:

1. Place development within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

According to the Federal Emergency Management Agency (FEMA) National Flood Insurance Rate Map, dated March 2, 2006, most of the parcels located within the Project Units are not within 100-year flood hazard areas. However, there are some small isolated areas within the Projects Units that are within or immediately adjacent to 100-year flood hazard areas (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to flood hazards that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

County General Plan policies 6.4.1 and 6.4.2 and County Code Chapter 16.10, Geologic Hazards, identify the need for hazards assessments for all development within flood hazard areas to ensure that development is protected from flood hazards

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

and does not contribute to flood-damage potential. Likewise, City General Plan policies SP-482, SA-483, SP-484, and SA-485 and Chapter 15.16, Flood Damage Prevention, of the Scotts Valley Municipal Code also specify similar requirements for development within flood hazard areas.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program, would not result in any potentially significant impacts related to flooding, as these measures would not change or otherwise affect flood conditions on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response to B-1.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 3. Be inundated by a seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

None of the parcels are located in proximity to the ocean or an enclosed body of water (see Section II, Table 1). Therefore, the potential for inundation by seiches or tsunami does not exist for the project.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The Project Units are located in mapped groundwater recharge areas. Existing development in the Project Units obtain water from the City of Santa Cruz, the San Lorenzo Valley Water District, the Mt. Hermon Water System, the Scotts Valley Water District (see Section II, Table 1), or from private wells.

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to groundwater that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Future projects in the Project Units covered by the ITPs would obtain water from the City of Santa Cruz, the San Lorenzo Valley Water District, the Mt. Hermon Water System, the Scotts Valley Water District, or from private wells. Although future residential projects covered by the ITPs may incrementally increase water demand, this increase is not expected to be substantial given the nature and extent of the residential projects and the interim time frame of the ITPs. Additionally, given that any development covered by the ITPs would be already contemplated in the City and County general plans, it is expected that the various water agencies have accounted for this growth in their water supply planning. While that is the case, County General Plan policies 7.18.2 and 7.18.3 require written commitments from water service providers of adequate water availability and assessment of impacts on municipal water systems prior to project approval.

City General Plan policies PSP-559, PSA-560 through PSA-567, and PSP-568 seek to promote the provision of adequate water service for residents through cooperation with water districts that serve the area and by requiring new service connections for discretionary projects in order to minimize the effects of private well development on basin-wide groundwater resources. Further, City General Plan policies OS0-336 through OSP-346 require protection of watersheds and recharge areas through various programs, mitigation for loss of recharge associated with development, and minimizing new impervious surfaces associated with new development.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in potentially significant impacts related to groundwater supplies or groundwater recharge. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would reduce the overall amount of ground disturbance, as compared to existing conditions. As a result, building coverage and other impervious surfaces could potentially be limited by the implementation of the IPHCP, which would minimize interference with groundwater recharge. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. Substantially degrade a public or private water supply? (Including the contribution of urban contaminants, nutrient enrichments, or other agricultural chemicals or seawater intrusion). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

See Response A-4 above for a discussion of the potential for soil erosion and associated potential for siltation. Runoff from future residential projects covered by the ITPs may contain small amounts of chemicals and other household contaminants. No commercial or industrial activities that would contribute a significant amount of contaminants to a public or private water supply would be covered by the ITPs.

6. Degrade septic system functioning?

See Response to A-6.

7. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding, on- or off-site?

IPHCP COVERED ACTIVITIES

See Response A-4 above for a discussion of existing County and City policies, programs, and regulations pertaining to erosion/siltation that are in place to address growth and development in the IPHCP Project Units. Additionally, County General Plan policies 7.23.1 through 7.23.4 and County Code Chapter 16.22, Erosion Control, stipulate that developments requiring a building permit or discretionary approval maintain runoff at predevelopment rates to prevent erosion and siltation. This requirement would also minimize the potential that downstream flooding could increase or that runoff would exceed the capacity of existing or planned storm water drainage systems, as a result of project development covered by the ITPs. Likewise, Chapter 15.06, Excavation, Grading, Erosion and Sediment Control Regulations of the Scotts Valley Municipal Code identify design standards and other requirements for drainage facilities as part of the issuance of grading permits. Requirements include specifications for maintaining peak storm water runoff and sediment rates at predevelopment rates, requirements for mitigation if runoff exceeds predevelopment levels, and mechanisms for protecting natural drainage ways.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in potentially significant impacts related to alteration of existing drainage patterns. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would reduce the overall amount of ground disturbance, as compared to existing conditions. As a result, changes in existing drainage patterns on parcels in the Project Units should be minimized. Therefore, the impact is *less than*

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

significant.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 8. | Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Responses A-4 and B-7 above.

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 9. | Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Refer to Responses B-1 and B-2 above.

- | | | | | | |
|-----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 10. | Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Responses to A-4, B-5, and B-7 above.

C. BIOLOGICAL RESOURCES

Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

COVERED SPECIES

The IPHCP is being prepared to address the potential incidental take of the federally endangered Mount Hermon June beetle associated with Covered Activities that are located on sites likely to be occupied by this species and the federally endangered Ben Lomond spineflower. These two federally endangered species are only known to occur in the Sandhills habitat of Santa Cruz County. The IPHCP would support the issuance of ITPs from the Service to the County and the City. The IPHCP provides a detailed description of these species in terms of their conservation status, life history, distribution, habitat requirements, threats, and recovery objectives. The IPHCP also provides an analysis of the potential loss of habitat and individuals of these species as a result of the Covered Activities. This information is based on various studies

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

conducted by Richard A. Arnold and Jody M. McGraw. The IPHCP is incorporated by reference and a brief summary of this information is provided herein to support, in part, the analysis of impacts under CEQA. Other references are cited.

Environmental Setting

Mount Hermon June Beetle

The Mount Hermon June beetle (*Polyphylla barbata*), a member of the family Scarabaeidae (Insecta: Coleoptera), has been listed as federally endangered since 1997, but critical habitat has not been designated for this species. The Mount Hermon June beetle has only one generation per year, but the majority of the life cycle occurs beneath the soil surface and presumably takes 2 to 3 years to complete. Adult females lay eggs beneath the soil surface on, or in close proximity, to host plants. Eggs hatch into larvae that feed on roots of host plants. As the larvae grow, they molt and eventually male and female adults emerge from pupae. Adult emergence and seasonal activity often begins in early June and continues through about mid-August (activity period). During the activity period, adult June beetles are active at night. Adult males emerge from the sandy soils and fly in search of pheromones released by flightless females which emerge from the soil. Mating occurs at the surface of the soil, and females retreat underground immediately where they presumably lay eggs. At the end of the flight period each evening, males burrow back into the soil, emerging repeatedly on subsequent evenings to search for mates.

The Mount Hermon June beetle has been found in association with Zayante sands and vegetation characteristic of the Sandhills (see Section C.2 below). Additionally, adult Mount Hermon June beetles have been found in disturbed areas where remnants of Sandhills habitat still occur. All documented observations of Mount Hermon June beetle reproduction are from sites that harbor Zayante soils. A limited number of observations of adult Mount Hermon June beetles have occurred on sandy soils in the immediate vicinity of, although not specifically on, Zayante soils.

The Mount Hermon June beetle has been observed in approximately 150 locations in Sandhills habitat (Zayante soils) in the vicinity of Mount Hermon, Felton, Ben Lomond, Zayante, and Scotts Valley. The species was also recently discovered in the Bonny Doon area. While the entire known range of the Mount Hermon June beetle encompasses a total area of nearly 10,000 acres, suitable habitat for the endangered insect is only known to occur within approximately 2,800 acres of that total, as of 2004. The precise amount of habitat which is currently occupied by the Mount Hermon June beetle is unknown. There is a close association between locations where the Mount Hermon June beetle occurs and various native Sandhills plant species, including ponderosa pines and Ben Lomond spineflower.

Ben Lomond Spineflower

The Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*), a small, short-lived annual herb of the buckwheat family (Polygonaceae), was listed as federally endangered in 1997, but critical habitat has not been designated. Seeds germinate in late fall after the first substantial rains. Plants form a basal rosette of leaves in the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

winter, bolt in late February and early March, flower between March and May, and then set seed between June and July. In open habitat, the Ben Lomond spineflower can reach seedling densities in the hundreds per square foot. When in bloom, the Ben Lomond spineflower often appears as a spreading mat of small, showy, pink flowers.

The Ben Lomond spineflower is endemic to the Sandhills and restricted to sandy soils of the Zayante series. Specifically, the Ben Lomond spineflower requires sandy soils in open, sparsely vegetated areas. The core of current and historical populations of the species occurs in the vicinity of Mount Hermon, Felton, Ben Lomond, Zayante, Scotts Valley, and Bonny Doon. Population sizes vary widely from year to year due to interannual variability in climate, particularly rainfall.

Remaining Habitat In the Project Units

Sand mining, residential and commercial development, recreational uses, and invasive, non-native plant species have resulted in the loss, degradation, and fragmentation of habitat for the Mount Hermon June beetle and the Ben Lomond spineflower. Of the total number of parcels in the 10 Project Units approximately 90 percent are developed and the average parcel size ranges from 0.14 to 0.65 acre. Despite development, the Mount Hermon June beetle and Ben Lomond spineflower are found around existing roads, sidewalks, and buildings, and in small vacant lots surrounded by residential development. The IPHCP identifies numerous ongoing activities associated with the existing residential development that threaten these populations (see IPHCP Table 4), which are unnaturally small and may be susceptible to extirpation from random genetic, demographic, or environmental events. Given the ongoing threats, habitat fragmentation, and developed nature of the Project Units, the remaining habitat for these species in these areas is highly degraded and suboptimal.

However, habitat within the Project Units does provide some long-term conservation value for the Mount Hermon June beetle and Ben Lomond spineflower. Though degraded, fragmented, and reduced in size, habitat within the 10 Project Units may support persisting populations, as many of the Project Units were developed more than 40 years ago. The Mount Hermon June beetle lives the vast majority of its life below ground. Therefore, it is possible that development within the Project Units, at least at the current level, might not cause extirpations of Mount Hermon June beetle populations in these areas. The fact that Mount Hermon June beetles, which have a life cycle of 2 to 3 years, still inhabit these areas suggests that populations may be able to persist in the Project Units despite the current level of development.

It is likely that remaining habitat in the Project Units also provides connectivity between otherwise isolated populations of the Mount Hermon June beetle and Ben Lomond spineflower. Many of the Project Units are located adjacent to intact habitat that is being preserved and, in some cases, specifically managed for long-term persistence of these species. Maintaining habitat and populations within the Project Units could allow migration between populations in these protected areas. Connectivity and migration can help maintain genetic diversity and facilitate natural recolonization of habitat following extirpations that might result from fire, disease, or other events.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Impact Analysis

IPHCP Covered Activities

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. Rather, the IPHCP and ITPs are being prepared to address the potential incidental take of Covered Species that may result from future Covered Activities in the Planning Units. While a regional HCP is being developed, the IPHCP and ITPs would provide an additional interim option for landowners to address the potential incidental take of Covered Species that would be more efficient and effective than the traditional property-by-property permitting process. Therefore, this subsection of the Initial Study provides for an assessment of the overall effectiveness of the IPHCP and ITPs in addressing the anticipated adverse effects on Covered Species associated with the Covered Activities and habitat removal allowed under the ITPs.

As indicated in the IPHCP, grading, land clearing, and construction activities associated with allowed Covered Activities would likely injure or kill plants and seeds of the Ben Lomond spineflower, and adults, larvae, pupae and eggs of the Mount Hermon June beetle. Construction of new buildings and associated infrastructure including driveways and sidewalks would permanently remove habitat (i.e., Zayante soils) for both species. Mount Hermon June beetle and Ben Lomond spineflower individuals that persist on a project site after construction activities would be threatened by ongoing use of the property.

It is not possible to determine or accurately predict how many individuals of each species would be injured or killed as a result of the Covered Activities. Comprehensive data describing the distribution and abundance of the Mount Hermon June beetle and Ben Lomond spineflower within the Project Units is not available. In addition, population densities of these species fluctuate annually such that the number of individuals impacted would depend on the year in which a given project is conducted. For these reasons, the IPHCP indicates that it is more tangible and biologically defensible to evaluate the impacts of the Covered Activities under the IPHCP in terms of degradation or destruction of habitat.

Take of the Mount Hermon June beetle authorized by the ITPs issued pursuant to the IPHCP would be defined in terms of the areal extent of the species' habitat (Zayante soils), that is disturbed by the Covered Activities. Within the Sandhills communities that occur on Zayante soils, surveys have revealed that the Mount Hermon June beetle occurs within a broad array of microhabitats, including conditions associated with existing high density development. Ground disturbing activities covered by the ITPs would negatively impact populations of the Mount Hermon June beetle in a variety of direct and indirect mechanisms. Therefore, it is reasonable to assume that conducting

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

these activities within Zayante soils in the Project Units would degrade or eliminate Mount Hermon June beetle habitat and injure or kill Mount Hermon June beetles.

The ITPs issued pursuant to this IPHCP would authorize the take of Mount Hermon June beetles on no more than 139 acres of Sandhills habitat in the Project Units. This acreage figure would be the maximum area of habitat disturbance allowed by the IPHCP and ITPs. It represents 5 percent of the estimated total amount (2,800 acres) of Sandhills habitat with documented occurrences of the Mount Hermon June beetle, as of 2004.

Given that the IPHCP would cover projects that are yet to be proposed it is not possible to determine the exact locations of the habitat that would be lost. Based on locations of proposed projects to date, the City and County anticipate that some portion of habitat would be lost in each Project Unit. Habitat would be lost only on parcels that are equal to or less than 1.5 acres in size. A maximum of 15,000 square feet of additional habitat would be lost on any given parcel. However, the City and County anticipate that most projects covered under the IPHCP (e.g., swimming pools, garages, room additions, etc.) would be smaller and would each result in a loss of less than 15,000 square feet of habitat.

According to the IPHCP, the degradation or loss of up to 139 acres of Sandhills habitat within the Project Units should not have a significant effect on the persistence of the Mount Hermon June beetle and Ben Lomond spineflower throughout the species' ranges. Existing populations of these species persist on and in exposed Zayante soils around existing structures and other infrastructure and in vacant parcels. No more than 15,000 square feet of additional habitat would be lost on any given parcel under the IPHCP. Additionally, these habitat losses would likely be distributed throughout the Project Units in rough proportion to the size of each unit. Given the amount and expected distribution of the habitat that may be lost, Mount Hermon June beetles and Ben Lomond spineflowers should continue to persist on and in exposed soils in each of the Project Units. Therefore, following implementation of the Covered Activities, each Project Unit would likely provide less habitat, but essentially a similar quality of habitat, for the Mount Hermon June beetle and Ben Lomond spineflower.

While both species would likely continue to inhabit the Project Units in the short term, it is not possible to definitively predict whether these areas would support long term persistent populations of the Mount Hermon June beetle and/or Ben Lomond spineflower. There are no historical data on populations of the species within the Project Units, precluding assessment of the effects of development on population density and trends. However, the IPHCP ultimately concludes that it is unlikely that the additional habitat loss and other impacts from the projects covered under the IPHCP would be a substantial additional threat to the long-term persistence of the Mount Hermon June beetle and Ben Lomond spineflower, given that 90 percent of the parcels within the Project Units are already developed. Further, populations of these species occur within a variety of habitat areas that are protected from development, including Henry Cowell State Park, Quail Hollow Ranch County Park, the conservation areas of the Quail Hollow Quarry, the conservation areas of the Hanson Quarry, the preserves

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

of the Zayante Sandhills Conservation Bank, and the Bonny Doon Ecological Reserve (Ben Lomond spineflower only).

IPHCP Minimization And Mitigation Measures

As indicated above, to receive coverage under the County or City's ITP, applicants must limit their development envelopes to a maximum of 15,000 square feet. This requirement could potentially limit overall habitat disturbance and associated adverse effects on the Covered Species. Total habitat removal/disturbance would be limited to 139 acres or 5 percent of the estimated total amount (2,800 acres) of Sandhills habitat with documented occurrences of the Mount Hermon June beetle, as of 2004. Further, as part of the project, the IPHCP contains an Operating Conservation Program that would require minimization and mitigation measures for all Covered Activities, which would reduce and compensate for any adverse effects on the Covered Species. The effectiveness of the minimization and mitigation measures in addressing adverse effects on Covered Species is further discussed below. Section 10(a)(2)(B) of the Endangered Species Act requires that all applicants submit HCPs that "minimize and mitigate" the impacts of take authorized by an incidental take permit, and that issuance of the permit would not "appreciably reduce the likelihood of the survival and recovery of the species in the wild." In general, HCPs should include mitigation programs that are based on sound biological rationale, practicable, and commensurate with the impacts of the project on species for which take is requested. Additionally, the Service encourages applicants to develop HCPs that contribute to the recovery of a listed species. If the proposed project is expected to result in permanent habitat loss, then the mitigation strategy should include compensatory mitigation consisting of the permanent preservation of suitable habitat.

In accordance with these guidelines and requirements, the IPHCP's Operating Conservation Program is intended to achieve its biological goals and objectives and to ensure that the adverse effects of Covered Activities on the Mount Hermon June beetle and Ben Lomond spineflower are minimized and mitigated to the maximum extent practicable. The Operating Conservation Program includes the following minimization and mitigation measures, and monitoring and reporting requirements (see Section II for additional information about the Operating Conservation Program). Monitoring would also be conducted to track compliance with the terms and conditions of the IPHCP, Implementing Agreement, and ITPs. All of these measures are included as part of the project being evaluated under CEQA.

IPHCP Minimization Measures. The IPHCP minimization measures would reduce habitat removal and/or disturbance and associated effects on Covered Species on a parcel-by-parcel basis. Specifically, the minimization measures would require landowners to avoid habitat loss to the greatest extent feasible. For areas that would be disturbed, the minimization measures would reduce the adverse effects on the Covered Species by minimizing ground disturbance during the growing season of the Ben Lomond spineflower and the adult flight period of the Mount Hermon June beetle, minimizing landscape elements that degrade habitat, and minimizing use of exterior

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

night lighting that attracts insects. Overall, these minimization measures would reduce the potential for direct and indirect effects on the Covered Species from Covered Activities. The minimization measures are provided in detail below and in the IPHCP.

- **Impacts to plants that are native to the Sandhills must be avoided to the greatest extent feasible, consistent with the purpose of the Covered Activity.**

Projects will be located to avoid the Ben Lomond spineflower, ponderosa pine, and silver-leaf manzanita whenever feasible, as determined by the City or County. Where avoidance is not feasible, minimizing impacts to native Sandhills plant species will be required.

Implementation of these measures will minimize impacts to the Mount Hermon June beetle by maintaining host plants for the species. In addition, implementation of these measures will minimize impacts to the Ben Lomond spineflower by retaining individuals of the species whenever feasible.

- **Ground-disturbing activities associated with construction (e.g., vegetation clearance, grading, digging, etc.) must be minimized between May 15 and August 15 within the development envelope.**

To the maximum extent feasible, the City and County will condition project approvals to avoid or minimize ground disturbance between May 15 and August 15.

Adult Mount Hermon June beetles actively search for mates and breed during the evenings for approximately 12 to 14 weeks, generally between May 15 and August 15. During this period, males and females may burrow into duff and soils at relatively shallow depths for protection during the daytime hours. This measure will minimize impacts to the Mount Hermon June beetle by avoiding disturbance of adults during the critical breeding season.

The Ben Lomond spineflower completes its annual life cycle between mid-October and early August. This measure reduces adverse impacts to the Ben Lomond spineflower by minimizing construction activities during the flowering and fruiting portions of its life cycle.

- **If construction-related ground disturbance associated with Covered Activities can not be scheduled to avoid the May 15 to August 15 time frame, participating landowners must ensure that areas that have been disturbed by construction activities are covered each evening during this time frame with tarps, landscape fabric, or other similar material. Only the immediate areas that have been recently disturbed must be covered in this manner between May 15 and August 15.**

As described above, adult Mount Hermon June beetles actively seek mates during the evenings between approximately May 15 and August 15. Following activity each evening, males may burrow into duff and soils for protection during the daytime hours. Under such circumstances, disturbed, sandy soils in a project area may attract Mount Hermon June beetles seeking shelter for the evening. This measure will minimize impacts to the Mount Hermon June beetle by preventing adults that may have emerged from Zayante soils near the project site from burrowing into disturbed areas on the project site and being injured or killed when project activities resume the following day.

- **Landscaping elements that degrade habitat must be minimized to the greatest**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

extent feasible, as determined by the City or County, and consistent with the purpose of the Covered Activity.

Adult Mount Hermon June beetles emerge from under the soil surface to attract and locate mates. Turf grass, dense ground cover plants (e.g., ivy), weed matting, aggregate, and mulch can degrade habitat for the Mount Hermon June beetle. This measure minimizes impacts to the Mount Hermon June beetle by limiting these landscaping elements where adults may emerge from beneath the soil surface.

This measure will minimize impacts to the Ben Lomond spineflower by limiting the installation of landscape materials that inhibit establishment, growth, and reproduction of the plant.

- **Indirect impacts to the Mount Hermon June beetle from project lighting must be minimized to the greatest extent feasible.**

Project activities between May 15 and August 15 will not utilize night lighting during construction. In addition, projects constructed under the IPHCP (Covered Activities) will minimize the installation of outdoor lighting. Permanent outdoor lighting shall be minimized and shall be shielded by fixture design or other means to minimize illumination of surrounding areas. If outdoor lighting is a necessary result of the Covered Activity (e.g., security lighting or lighting for handicap access structures), light sources (bulbs) that do not attract insects (e.g., yellow or sodium vapor bulbs) will be used to the maximum extent feasible.

During the species' activity period (May 15 – August 15), male Mount Hermon June beetles fly to seek mates for a brief period beginning near dusk each evening. If these male Mount Hermon June beetles are attracted to artificial light sources, it may disrupt their reproductive behavior. This measure will minimize impacts to the Mount Hermon June beetle by avoiding potential interference with adult male Mount Hermon June beetle behavior during the breeding season.

IPHCP Mitigation Measures. Under the IPHCP, the take of individuals of the Covered Species resulting from Covered Activities must be mitigated for by permanently preserving and managing suitable habitat outside of the Project Units. Covered Activities would be limited to small "infill-type" projects in areas that contain previous development. Habitat for the Mount Hermon June beetle and/or Ben Lomond spineflower in the Project Units is fragmented and, in many cases, of reduced quality relative to larger contiguous, undisturbed parcels. Therefore, according to the IPHCP, protection in perpetuity of contiguous blocks of high quality habitat outside of the Project Units should compensate for the impacts of Covered Activities within the Project Units and should help ensure the long-term conservation of these species. The IPHCP mitigation measures include the following:

- **Planting of Native Sandhills Plant Species.**

To the maximum extent feasible, the City and County will require that any revegetation or landscaping activities associated with Covered Activities are conducted using locally-derived source material (i.e., seeds or cuttings) of plant species native to the Sandhills, with particular emphasis on the plant species identified in Appendix F of the IPHCP.

- **Securing Off-site Mitigation.**

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Prior to beginning any ground-disturbing activities, the impacts of Covered Activities must be mitigated in one of the following ways:

1. Secure conservation credits for the Mount Hermon June beetle at a ratio of 1:1 in terms of acres of disturbance to numbers of credits (e.g., a project with a 0.1-acre disturbance envelope will mitigate by securing 0.1 acre of conservation credits for the Mount Hermon June beetle) at the Zayante Sandhills Conservation Bank; or
2. Secure conservation credits for the Mount Hermon June beetle at a ratio of 1:1 in terms of acres of disturbance to numbers of credits (e.g., a project with a 0.1-acre disturbance envelope will mitigate by securing 0.1 acre of conservation credits for the Mount Hermon June beetle) at another Service-approved conservation bank, which also has an Operating Agreement with the County if the parcel is within the County's jurisdiction.

Because contiguous areas of high-quality habitat will be used to mitigate for impacts to fragmented, lower-quality habitat, the mitigation ratio for Covered Activities would be 1 to 1 in terms of the area of disturbance envelope to the number of conservation credits of mitigation responsibility.

According to the Service's *Guidance for the Establishment, Use, and Operation of Conservation Banks* (Service 2003), a conservation bank is "a site where habitat and/or other ecosystem resources are conserved and managed in perpetuity for listed species expressly for the purpose of offsetting impacts occurring elsewhere to the same resource values." According to this guidance, from the Service's perspective, conservation banking reduces the piecemeal approach to conservation efforts that can result from individual projects by establishing larger reserves and enhancing habitat connectivity. Larger reserves are more likely to ensure ecosystem functions, foster biodiversity, and provide opportunities for linking existing habitat. The above noted guidance is for use by Service personnel in evaluating and approving conservation banks. Implicit in the approval of a conservation bank, is the recognition that adverse effects to a species may be offset by the conservation improvements offered by the approved bank.

Further, the CEQA Guidelines acknowledge that mitigation for a significant impact can constitute any or all of the following types of actions: (1) avoiding the impact by not taking certain actions or parts of an action; (2) minimizing the impact by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing/eliminating the impact over time by preservation and maintenance operations; and/or (5) compensating for the impact by replacing or providing substitute resources or environments (CEQA Guidelines Section 15370). The requirements of the IPHCP encompass all of these types of actions. Specifically, the later two actions are provided for via the purchase of conservation credits commensurate with the habitat loss, which fund the preservation, conservation, and maintenance of high-quality Sandhills habitat.

Currently, there are no other Service-approved Sandhills conservation banks, therefore, it is expected that credits would be obtained from the Service-approved Ben Lomond Sandhills Preserve of the Zayante Sandhills Conservation Bank unless or until

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

another Service-approved conservation bank is put in place. A summary of the Ben Lomond Sandhills Preserve is provided below based on the *Adaptive Management and Monitoring Plan for the Zayante Sandhills Conservation Bank* (McGraw 2006).

The Ben Lomond Sandhills Preserve, comprised of 22.8 acres of high quality Sandhills habitat and prime habitat for the Mount Hermon June beetle, is the first phase of the Zayante Sandhills Conservation Bank. Previously private property, this land will be preserved in perpetuity through conservation easements with the Center for Natural Lands Management, Inc. The biological goals and objectives for the Preserve focus on:

- Preserving and enhancing the six endangered or special-status species populations present in the Preserve (Mount Hermon June beetle, Zayante band-winged grasshopper, Ben Lomond spineflower, Santa Cruz wallflower, Ben Lomond buckwheat, and silverleaf manzanita).
- Increasing the understanding of the ecological factors influencing the distribution, abundance, and population persistence of these species.
- Maintaining or enhancing the structure and species composition of the native plant communities.
- Facilitating the ecological processes required to sustain the endemic sandhills populations and communities.

Approximately 90 percent of the Preserve, consisting of high quality habitat that supports a high diversity and abundance of native species, will be managed and maintained. Enhancement and restoration will occur on approximately 10 percent of the Preserve, which consists of habitat areas that have moderate or reduced diversity and abundance of native Sandhills species, as a result of habitat degradation. Key management strategies that are used throughout the Preserve include:

- Research to increase knowledge of the system's ecology to inform management.
- Exotic plant removal and management to facilitate endangered species and communities.
- Recreation management to enhance and maintain available habitat.
- Fire management to maintain a patch mosaic of communities and reduce the probability of wildfire.

The adaptive management program for the Preserve also involves monitoring to facilitate progress toward the stated biological goals and objectives. The monitoring provides feedback information for subsequent management changes and adaptations, including remedial actions, if necessary. The habitat management and monitoring of the Preserve is funded by an endowment established and managed by a private enterprise which contributes a portion of each credit sale from the Preserve to the endowment.

Based on the existing characteristics of the habitat and the approvals received to date from the Service, the conservation value of the Preserve has been quantified and

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

converted into a credit system that may be bought, sold, or traded for the purposes of offsetting the impacts of development on endangered species and their habitats within the service area of the conservation bank. The number of available conservation credits for the Preserve has been determined in the *Zayante Sandhills Conservation Bank: Evaluation of Conservation Credits for the Ben Lomond Sandhills Preserve* (Arnold 2006). According to this document, the Preserve plays an important role in local and regional conservation efforts in the Zayante Sandhills because it is contiguous with much of the habitat set aside at Quail Hollow Quarry, as well as several smaller properties surrounding the quarry and along Hihn Road.

Available conservation credits at the Preserve have been identified for Mount Hermon June beetle, Ben Lomond spineflower, and a number of other native Sandhills species, based on the existing habitats and native species that the Preserve supports. These credits can be purchased by landowners (or applicants on behalf of landowners) that have been extended coverage by the County or City under the IPHCP and their respective ITPs. While the conservation credits are for particular species, the mitigation fees obtained through the purchase of credits associated with Covered Activities would support the long-term preservation of Preserve lands and the various management and monitoring activities of the Preserve. Therefore, the purchase of conservation credits for Mount Hermon June beetle, as required by the IPHCP, would provide mitigation fees that could benefit other endangered species present in the Preserve, including the Ben Lomond spineflower.

Impact Conclusion

Under CEQA, a project would have a significant impact if it would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species.

As indicated above, the IPHCP acknowledges that there would be an overall allowed loss of habitat (up to 139 acres) for Covered Species in the Project Units with the implementation of the ITPs, which would adversely affect individuals of these species. The IPHCP concludes that it is unlikely that this additional habitat loss and other impacts from the Covered Activities would result in a substantial additional threat to the long-term persistence of the Mount Hermon June beetle and Ben Lomond spineflower throughout the species' ranges.

The IPHCP minimization measures would reduce habitat removal and/or disturbance and associated effects on Covered Species on a parcel-by-parcel basis. Specifically the minimization measures would require landowners pursuing Covered Activities to avoid habitat loss to the greatest extent feasible. Further, IPHCP compensatory mitigation measures would require that landowners pursuing Covered Activities: (1) landscape and revegetate using plant species native to the Sandhills and (2) secure conservation credits from a Service-approved conservation bank for the Mount Hermon June beetle at a 1:1 ratio in terms of acres of disturbance to numbers of credits. The purchase of such credits would compensate for or offset any adverse effects of Covered Activities on the Covered Species, as mitigation fees provided by the purchase of credits would support the on-going conservation and management

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

activities at the Preserve and would contribute to the conservation and recovery of both of the Covered Species. Given the above, the project would not have a substantial adverse effect on these species under CEQA. Therefore, the impact is *less than significant*.

NON-COVERED SPECIES

Environmental Setting

Zayante Sandhills support a number of other federal- and/or state-listed endangered species of animals and plants, as well as other special plant taxa that are recognized by the California Native Plant Society (CNPS) (see Table 4 below). These species are referred to as “Non-Covered Species” in this subsection of the Initial Study, as they are not addressed by or otherwise covered by the proposed IPHCP or ITPs.

Table 4: Non-Covered Special-Status Species Found in Zayante Sandhills

Common Name	Scientific Name	Conservation Status ¹
Zayante Band-winged Grasshopper	<i>Trimerotropis infantilis</i>	FE
Santa Cruz (Ben Lomond) Wallflower	<i>Erysimum teretifolium</i>	FE, CE, 1B
Santa Cruz Cypress	<i>Hesperocyparis abramsiana</i> (current name) <i>Cupressus abramsiana</i> (previous name)	FE, CE, 1B
Silverleaf Manzanita	<i>Arctostaphylos silvicola</i>	1B
Ben Lomond Buckwheat	<i>Eriogonum nudum</i> var. <i>decurrens</i>	1B
Santa Cruz Monkeyflower	<i>Mimulus rattanii</i> ssp. <i>decurtatus</i>	4
Curly-leaved Monardella	<i>Monardella undulata</i>	4
SOURCE: Zayante Sandhills Conservation Bank: Evaluation of Conservation Credits for the Ben Lomond Sandhills Preserve, Richard A. Arnold, Ph.D., April 15, 2006.		

¹Conservation Status:

FE = federally endangered

CE = California endangered

1B = CNPS List 1B: rare, threatened, or endangered in CA and elsewhere

4 = CNPS List 4: plants of limited distributions (“a watch list”)

The federally listed Zayante band-winged grasshopper and Ben Lomond wallflower are known to occur in Sandhills habitat. However, based on the documentation provided in the IPHCP, these species are not likely to occur in the Project Units covered by the IPHCP. Further, Santa Cruz cypress occurs in the Santa Cruz Mountains, but is not currently known to occur in any of the IPHCP Project Units. Therefore, these species are not covered by the IPHCP and the ITPs.

A number of additional federal- and/or state-listed endangered and threatened species occur in the larger San Lorenzo River watershed, including but not limited to: California red-legged frog (*Rana aurora draytonii*), Ohlone tiger beetle (*Cicindela ohlone*), Santa Cruz tarplant (*Holocarpha macradenia*), etc. Although they are not currently known to occur in any of the IPHCP Project Units, these species could

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

potentially be discovered in the Project Units in the future, as indicated in the IPHCP.

Impact Analysis

IPHCP Covered Activities

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of the existing County and City policies, programs, and regulations pertaining to special-status species that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

According to the IPHCP, no take of, or adverse impacts to, any other federally listed or proposed species is anticipated to occur as a result of the Covered Activities. According to the IPHCP, if the Zayante band-winged grasshopper, Ben Lomond wallflower, or any other federally listed species are discovered within any of the Project Units, the Service would evaluate this new information and determine what, if any, IPHCP Covered Activities may affect these species. In addition, if the IPHCP Covered Activities would likely result in incidental take of any other federally listed animal species, the City and County would coordinate with the Service and either request a permit amendment or implement activities that would avoid the take of such species. Any permit amendment would be subject to the environmental review requirements of CEQA and NEPA and such review would take place, if and when a permit amendment is considered.

Additionally, the County and the City would refer individual applicants to the Service when proposed projects may result in the take of federally-listed species not covered by the IPHCP and ITPs. On lands under County jurisdiction, any proposed development in the Project Units would be evaluated by qualified staff, including a site visit to each parcel where development is proposed. In some cases, a biotic assessment may also be required and, if needed, a biotic report, per the County's Sensitive Habitat Protection Ordinance (County Code Chapter 16.32, Sensitive Habitat Protection). The presence or potential presence of other special-status species on the property being evaluated under the terms of the IPHCP and ITPs due to its Covered status could also be identified through this process.

IPHCP Minimization and Mitigation Measures

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in any potentially significant impacts related to special-status species not covered by the IPHCP and ITPs. The IPHCP minimization measures would reduce Sandhills habitat removal and/or disturbance and associated affects on other special-status species that may occur in this habitat. Specifically, the minimization measures would require landowners to avoid habitat loss and disturbance

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

to the extent feasible. Overall, these minimization and mitigations measures would also reduce the potential that Covered Activities would result in direct or indirect effects on other special-status species that could be present. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. Have a substantial adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations (e.g., wetland, native grassland, special forests, intertidal zone, etc.) or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response C-1 above. The Project Units consist of mostly developed residential areas with remnant patches of Sandhills habitat, which is identified as a sensitive biotic community by Santa Cruz County and is covered by the County’s Sensitive Habitat Protection Ordinance (County Code Chapter 16.32, Sensitive Habitat Protection). The IPHCP provides a detailed description of this habitat based on various studies conducted by a number of local biologists, which is incorporated by reference.

The degradation or loss of up to 139 acres of Sandhills habitat within the Project Units would not have a substantial adverse effect on the environment under CEQA given that: implementation of the IPHCP would result in disturbance in remnant patches of habitat, implementation of the minimization measures would reduce habitat removal and disturbance to the extent possible, and compensatory mitigation measures would compensate for the acreage of habitat loss/disturbance at a 1 to 1 ratio. Therefore, the impact is *less than significant*. (See Response C-1 for further information.)

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. 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 or migratory wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Covered Activities within the Project Units would include small residential projects in areas with existing residential development. As a result, the proposed project does not involve any activities that would significantly interfere with the movements or migrations of fish or wildlife. Any impacts to early life stages of Mount Hermon June beetle would be fully mitigated through the purchase of conservation credits. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. Produce nighttime lighting that would | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

substantially illuminate wildlife
habitats?

See Response to C-1 above. The IPHCP includes minimization measures to reduce direct and indirect effects of the Covered Activities on Covered Species and associated habitat. One of these measures addresses nighttime lighting and requires that it be minimized to the greatest extent feasible and designed to avoid attracting the Mount Hermon June beetle. See Response C-1 for the details of this measure.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Impact Analysis

IPHCP Covered Activities

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not have a substantial adverse effect on federally protected wetlands. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to wetlands and development in the IPHCP Project Units, including that associated with the Covered Activities.

As reflected in Table 5 below, County General Plan policies 5.1.1 through 5.1.15, and County Code Chapters 16.30 and 16.32, are designed to promote conservation of sensitive habitats, including wetlands. Pursuant to these policies and ordinances, development within wetlands and other sensitive habitats must be avoided to the extent possible and, when avoidance is not feasible, impacts must be minimized and mitigated. City General Plan policies pertaining to sensitive habitats are presented in Table 6. OSP-325 calls for preservation of environmentally sensitive habitat areas. Other policies, such as OSA-320 and OSA-321, specify that the environmental review and permit processes be used to identify, maximize protection of, and mitigate impacts to valuable habitat areas. Consequently, development within the IPHCP Project Units, including that associated with Covered Activities, would not result in substantial adverse effects on federally protected wetlands.

IPHCP Minimization and Mitigation Measures

Implementation of the various elements of the IPHCP, including the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program, would not result in any potentially significant impacts to federally protected wetlands, as these measures would not change or otherwise affect wetlands on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 6. Conflict with any local policies or ordinances protecting biological resources (such as the Sensitive Habitat Ordinance, Riparian and Wetland Protection Ordinance, and the Significant Tree Protection Ordinance)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

SANTA CRUZ COUNTY POLICIES AND REGULATIONS

The issuance of the ITPs based on the IPHCP would not result in conflicts with any County policies or regulations adopted for the purpose of protecting biological resources. The IPHCP has been developed to conform with existing County policies and regulations. The project would not result in a potentially significant impact related to conflicts with plans and policies. Therefore, the impact is *less than significant*. See further discussion below.

Santa Cruz County Policies

The Santa Cruz County General Plan Conservation and Open Space Element addresses sensitive habitats in policies 5.1.1 through 5.1.15. These policies, in conjunction with the County’s Sensitive Habitat Protection Ordinance (see further discussion below), seek to minimize the disturbance of biotic communities which are rare or especially valuable because of their special nature or role in an ecosystem. As indicated in Table 5, below, the issuance of the ITPs and the implementation of the IPHCP would not conflict with any relevant policies of the County related to sensitive habitats.

Table 5. Relevant Santa Cruz County General Plan Policies

Policy #	Policy Summary	Project Consistency
5.1.1	Sensitive Habitat Designation applies to areas shown on General Plan Resources and Constraints Maps or any undesignated areas which meet the criteria in policy 5.1.2 and are identified through biotic review process or other means.	Project Units contain sensitive habitat, as identified on the County’s Constraint Maps.
5.1.2	Definition of Sensitive Habitat includes: habitats with special biological significance, locally unique biotic communities (e.g., sand parkland), special-status species habitats, wetlands, riparian areas, etc.	Project Units contain sensitive habitat per this definition, as they contain remnant patches of Sandhills communities.
5.1.3	Environmentally Sensitive Habitats within the Coastal Zone should be designated as such per the California Coastal Act with related requirements	Not applicable, as the Project Units are not within the Coastal Zone.
5.1.4	Sensitive Habitat Protection Ordinance should be implemented to protect sensitive habitats. The ordinance identifies sensitive habitats, determines the uses which are allowed in and adjacent to such habitats, and specifies required performance standards.	See discussion under Santa Cruz County Regulations below.
5.1.5	Land Division and Density Requirements in Sensitive Habitats should be allowed only when the density and design of the subdivision are compatible with the protection of these resources.	As indicated in Responses C-1 and C-2 above, issuance of the ITPs based on the IPHCP would not result in any significant disruption of habitat values for the Covered Species. Subdivisions would not be allowed under the IPHCP/ITPs, and any Minor Land Divisions would have to comply with all of the eligibility requirements of a single parcel. Therefore, the project would conform with this policy.

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

Policy #	Policy Summary	Project Consistency
5.1.6	Development Within Sensitive Habitats - Sensitive habitats shall be protected against any significant disruption of habitat values; and any proposed development within or adjacent to these areas must maintain or enhance the functional capacity of the habitat. Reduce in scale, redesign, or, if no other alternative exists, deny any project which cannot sufficiently mitigate significant adverse impacts on sensitive habitats unless approval of a project is legally necessary to allow a reasonable use of the land.	As indicated in Responses C-1 and C-2 above, the issuance of the ITPs based on the IPHCP would not result in any significant disruption of habitat values for the Covered Species. Therefore, the project would conform with this policy. See further discussion under Santa Cruz County Regulations, below.
5.1.7	Site Design and Use - To protect sensitive habitats, utilize site design and use regulations on parcels containing these resources: (a) structures shall be placed as far from the habitat as feasible, (b) delineate development envelopes to specify location of development; (c) require easements, deed restrictions, or equivalent measures to protect sensitive habitat on a project parcel which is undisturbed by a proposed development or to protect sensitive habitats on adjacent parcels; (d) prohibit domestic animals where they threaten sensitive habitats; (e) limit removal of native vegetation to the minimum amount necessary for improvements; and (f) prohibit landscaping with invasive or exotic species and encourage the use of characteristic native species.	The minimization measures contained in the IPHCP generally conform with this policy, but provide for additional elaboration as to how to specifically minimize direct and indirect effects on Covered Species.
5.1.8	Chemicals Within Sensitive habitats - Prohibit the use of insecticides, herbicides, or any toxic chemical substance in sensitive habitats.	The issuance of the ITP would not affect the implementation of this policy.
5.1.9	Biotic Assessments shall be required in areas of biotic concern and/or sensitive habitats as part of normal project review to determine whether a full biotic report should be prepared by a qualified biologist	The issuance of the ITP would not affect the implementation of this policy.
5.1.10	Species Protection - Recognize that habitat protection is only one aspect of maintaining biodiversity and that certain wildlife species, such as migratory birds, may not utilize specific habitats. Require protection of these individual rare, endangered and threatened species and continue to update policies as new information becomes available.	The issuance of the ITP would not affect the implementation of this policy.
5.1.11	Wildlife Resources Beyond Sensitive Habitats - For areas which may not meet the definition of sensitive habitat, yet contain valuable wildlife resources, protect these wildlife habitat values and species using the techniques outlined in policies 5.1.5 and 5.1.7 and use other mitigation measures identified through the environmental review process.	The issuance of the ITP would not affect the implementation of this policy.
5.1.12	Habitat Restoration with Development Approval - Require as a condition of development approval, restoration of any area of the subject property which is an identified degraded sensitive habitat, with the magnitude of restoration to be commensurate with the scope of the project.	The implementation of this policy related to Covered Activities would need to occur consistent with the IPHCP minimization measures to ensure restoration activities do not result in effects on Covered Species.
5.1.13	Habitat Damaged by Code Violations - Where a sensitive habitat has been damaged as a result of a code violation, require that restoration of damaged areas be undertaken in compliance with all necessary permits.	The implementation of this policy related to Covered Activities would need to occur consistent with the IPHCP minimization measures to

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

Policy #	Policy Summary	Project Consistency
		ensure restoration activities do not result in effects on Covered Species.
5.1.14	Removal of Invasive Plant Species - Encourage the removal of invasive species and their replacement with characteristic native plants.	The implementation of this policy related to Covered Activities would need to occur in conformance with the IPHCP minimization measures to ensure activities do not result in effects on Covered Species.
5.1.15	Priorities for Restoration Funding - Establish funding priorities among restoration projects by assessing the biological significance of the habitat and the degree of endangerment from development	The issuance of the ITP would not affect the implementation of this policy.

Santa Cruz County Regulations

County Code Chapter 16.32, Sensitive Habitat Protection, seeks to minimize the disturbance of biotic communities which are rare or especially valuable because of their special nature or role in an ecosystem. An area is defined as a sensitive habitat if it meets one or more of the following criteria:

- a. Areas of special biological significance as identified by the State Water Resources Control Board.
- b. Areas which provide habitat for locally unique biotic species/communities including but not limited to: oak woodlands, coastal scrub, maritime chaparral, native rhododendrons and associated Elkgrass, indigenous Ponderosa Pine, indigenous Monterey Pine, mapped grassland in the Coastal Zone and sand parkland; and Special Forests including San Andreas Oak Woodlands, indigenous Ponderosa Pine, indigenous Monterey Pine and ancient forests.
- c. Areas adjacent to essential habitats of rare, endangered or threatened species as defined in (e) and (f) below.
- d. Areas which provide habitat for species of special concern as listed by the California Department of Fish and Game in the Special Animals list, Natural Diversity Database.
- e. Areas which provide habitat for rare or endangered species which meet the definition of Section 15380 of the California Environmental Quality Act guidelines.
- f. Areas which provide habitat for rare, endangered or threatened species as designated by the State Fish and Game Commission, United States Fish and Wildlife Service or California Native Plant Society.
- g. Nearshore reefs, rocky intertidal areas, seacaves, islets, offshore rocks, kelp beds, marine mammal hauling grounds, sandy beaches, shorebird roosting, resting and nesting areas, cliff nesting areas and marine, wildlife or educational/research reserves.
- h. Dune plant habitats.

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

- i. All lakes, wetlands, estuaries, lagoons, streams and rivers.
- j. Riparian corridors.

Sites that are occupied by the Mount Hermon June beetle and Ben Lomond spineflower are protected under the County’s Sensitive Habitat Protection Ordinance because these species are endangered species designated by the Service and they occur in the locally unique Sandhills habitat. The IPHCP’s mitigation strategy is based on the preservation and long-term management of Sandhills habitat through the acquisition of mitigation credits and other means, and the County has determined that it is sufficient to fulfill the requirements of the Sensitive Habitat Protection Ordinance with respect to the Mount Hermon June beetle and Ben Lomond spineflower. Overall, the issuance of the ITP to the County should not conflict with or otherwise impede the implementation of the County’s Sensitive Habitat Protection Ordinance related to these or other protected species or habitats.

CITY OF SCOTTS VALLEY POLICIES AND REGULATIONS

The issuance of the ITPs based on the IPHCP would not result in conflicts with any City policies or regulations adopted for the purpose of protecting biological resources. The IPHCP has been developed to conform with existing City plans, policies, and regulations. The project would not result in a potentially significant impact related to conflicts with plans and policies. Therefore, the impact is *less than significant*. See further discussion below.

City of Scotts Valley Policies

The City of Scotts Valley General Plan Open Space and Conservation Element addresses sensitive habitats in policies OSO-317 through OSA-322 and OSO-324 through OSA-328. These policies seek to minimize the disturbance of native plant and animal habitats. As indicated in Table 6, below, the issuance of the ITPs and the implementation of the IPHCP would not conflict with any relevant policies of the City related to sensitive habitats.

Table 6. Relevant City of Scotts Valley General Plan Policies

Policy #	Policy Summary	Project Consistency
OSO-317	Minimize the disturbance or removal of native vegetation.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the Project Units.
OSP-318	New development proposed in areas containing native plant communities shall be carefully planned and provide for the conservation and maintenance of these plants.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the Project Units.
OSA-319	Develop a comprehensive list of known rare and endangered plants and animals in the planning area.	The issuance of the ITP would not affect the implementation of this policy.
OSA-320	Use the environmental review process to identify and mitigate impacts of development on native plant communities and valuable habitat areas.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the

Potentially Significant Impact Less than Significant with Mitigation Incorporated Less than Significant Impact No Impact

Policy #	Policy Summary	Project Consistency
		Project Units.
OSA-321	Through the permit process, the City shall require that proposed development located in or adjacent to native plant communities or valuable habitat areas be planned to maximize protection of the resource.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the Project Units.
OSA-322	Development of vacant land located within valuable habitats shall be limited to low densities, cluster developments, and/or passive recreational uses.	The issuance of the ITP would not affect the implementation of this policy.
OSO-324	Establish protective measures for habitat areas of particular environmental sensitivity and for rare or endangered animal species.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the Project Units.
OSP-325	Environmentally sensitive habitat areas and rare and endangered animal species shall be preserved.	The issuance of the ITP would support the implementation of this policy.
OSA-326	As part of the environmental review process, new development within areas of rare or endangered wildlife habitat shall prepare a site-specific survey which identifies the locations and type of species present.	The issuance of the ITP would not affect the implementation of this policy.
OSA-327	Through the permit process, ensure land uses in or adjacent to environmentally sensitive habitats shall attempt to avoid significant impairment of habitat value without adequate mitigation.	The issuance of the ITP would support the implementation of this policy related to Covered Activities in the Project Units.
OSA-328	The City shall identify those sites that are greater than one acre and contain or are located adjacent to significant habitats and encourage, where appropriate, acquisition by the Land Trust or similar organization.	The issuance of the ITP would not affect the implementation of this policy.

City of Scotts Valley Regulations

The City of Scotts Valley does not have an ordinance related to sensitive habitat protection, as does the County of Santa Cruz. However, the City does have a Tree Protection Ordinance (City of Scotts Valley Municipal Code Chapter 17.44.080) to protect significant trees which are a valued resource to the community of Scotts Valley. Determination of which trees receive protection is based on: 1) location; 2) size; 3) requirements of permits approved by the City's Planning Department or Planning Commission; and 4) status as a "heritage tree." The City's tree ordinance may protect some ponderosa pine (*Pinus ponderosa*) trees that are designated heritage trees, grow near roadways, grow on slopes, or are large in size. Ponderosa pines are a critical element of Sandhills habitat, and are the dominant species within Maritime Coast Range Ponderosa Pine Forest, a sensitive plant community endemic to the Sandhills.

According to the IPHCP, projects receiving take coverage under the IPHCP must be situated to avoid impacting native Sandhills plant species (including native trees) to the maximum extent possible (see Response C-1 above). Where complete avoidance is not feasible, projects covered by the IPHCP would be required to minimize impacts to native Sandhills plant species. Therefore, it is not anticipated that implementation of the IPHCP would result in the loss of any pines protected under the City's Tree Protection Ordinance and therefore would not conflict with this ordinance.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The USFWS has approved nine individual Low Effect HCPs for the Mount Hermon June beetle and one Low Effect HCP for the Mount Hermon June beetle and Ben Lomond spineflower. Eight of these 10 individual HCPs are located within the proposed IPHCP area. Implementation of the IPHCP and issuance of the associated ITPs to the County and City would not conflict with any of the provisions of these individual HCPs. There are no other approved local, regional, or state habitat conservation plans in the IPHCP vicinity. Therefore, there is *no impact*.

D. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

There are no mapped agricultural resources located in the Project Units, nor are these areas designated for agricultural use in the County and City general plans. However, there are some parcels adjacent to portions of the Project Units that are zoned Residential Agriculture (RA) in the County's General Plan, so there could be agricultural uses in the vicinity of the Project Units. On RA lands "small scale commercial agriculture, such as animal keeping, truck farming and specialty crops, can take place in conjunction with the primary use of the property as residential" per County Code Chapter 13.10, Zoning Regulations.

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to agriculture that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

While development on some parcels within the Project Units could potentially be in proximity to small-scale agricultural operations, if any, such operations are expected to be already occurring in conjunction with existing adjacent residential uses. Therefore, Covered Activities should not result in substantial additional adverse effects on adjacent lands used for agricultural purposes, such that those uses are hampered or otherwise affected. Likewise, existing adjacent agricultural operations, if any, should not substantially affect Covered Activities due to noise, dust, odor, and other effects which may be a result of normal commercial agricultural operations.

Future development of Covered Activities would have to be conducted in accordance with applicable County policies, such as Policy 5.13.27, which indicates that structures shall be sited to minimize possible conflicts with agriculture in the area. However, it should be noted that many of the County General Plan policies and the Agricultural Preservation and Protection Ordinance (Chapter 16.50 of the County Code) apply only to Commercial Agricultural Land designated in the County General Plan. Such land is not located in proximity to the Project Units and therefore these particular policies and regulations do not apply. The City of Scotts Valley does not have any relevant policies or regulations related to the potential for conflicts with adjacent agricultural uses.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in any potentially significant agricultural-related impacts, as these measures would not change or otherwise affect land designated for agricultural use by the County General Plan. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 2. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

As indicated above in D-1, there are no mapped agricultural resources located in the Project Units, nor are these areas designated for agricultural use in the County and City general plans. Consequently, no Williamson Act contracts would be affected by the project.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Section 4526), or timberland zoned
Timberland Production (as defined by
Government Code Section 51104(g))?

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to timber that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

It is unlikely that Covered Activities within this Project Unit would affect timber resources in the future, as no mapped resources are located on parcels that could be developed under the IPHCP. It should also be noted that timber resources may only be harvested in accordance with California Department of Forestry timber harvest rules and regulations and with County Code Chapter 16.52, Timber Harvesting Regulations.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in any potentially significant timber-related impacts, as these measures would not change or otherwise affect land designated as Timber Resources by the County General Plan. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

As noted above in D-1, no mapped timber resources are located on parcels that could be developed under the IPHCP. Additionally, implementation of the IPHCP’s conservation program would not change or otherwise affect land designated as Timber resources. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Responses to D-1 and D-2 above.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

E. MINERAL RESOURCES

Would the project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to mineral resources that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

As indicated above, mapped mineral resources are located in the Scotts Valley Project Units. Given that parcels that could be covered by the City’s ITP are small (1.5 acres or less) and located in already densely developed areas, it is unlikely that development on these parcels that fall under the ITP would further limit the potential use or extraction of these resources over existing conditions. Additionally, the City General Plan and Municipal Code do not limit development or otherwise protect mineral resources in these areas.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in any potentially significant impacts related to mineral resources, as these measures would not change or otherwise affect mineral resources. Therefore, the impact is *less than significant*.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response to E-1 above.

F. VISUAL RESOURCES AND AESTHETICS

Would the project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | Have an adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

A number of County- or City-designated scenic roads are located within or adjacent to the IPHCP Project Units (see Section II, Table 1). There are no other visual or scenic resources in the Project Units that have been identified and/or mapped by the County or the City.

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to visual resources and aesthetics that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Given that covered residential projects that fall under the ITPs would be located on small parcels (1.5 acres or less) in already densely developed residential areas, it is unlikely that development on these parcels would have any additional adverse effect on designated scenic roads or would result in visual obstruction of these resources from public vantage points. However, Covered Activities would need to conform with County General Plan policies related to protection of vistas from designated scenic roads.

Similarly, it is unlikely that development on these parcels would degrade the existing visual character or quality of these sites and their surroundings. County General Plan policies 8.1.2 and 8.1.3 and County Code Chapter 13.10, Zoning Regulations, provide development standards for residential districts, which would ensure that standards for maximum building height, maximum number of stories, minimum setbacks, maximum ratios for floor area-to-parcel size, and other criteria are met for residential projects, as relevant. Likewise, Chapter 17, Zoning, of the Scotts Valley Municipal Code identifies similar development standards for residential projects. Compliance with these County and City standards, as part of the issuance of applicable building and other discretionary permits, would help to ensure that Covered Activities would not degrade the existing visual character or quality of these various sites and their surroundings.

Future development covered by the ITPs may create an incremental increase in night lighting in the Project Units, depending on the type of residential project. However, such an increase would be small and similar in character to the lighting associated with the surrounding existing residential uses in these already densely developed areas. Therefore, any increase in night lighting should not adversely affect the existing visual character or quality of these Project Units.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not result in

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

any potentially significant visual or aesthetic impacts. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would further reduce the overall amount of ground disturbance. The IPHCP could potentially result in new development with reduced visual resource and aesthetic effects, to the extent that these measures serve to reduce overall building size in the Project Units. Further, minimization measures would also require that outdoor lighting be minimized and shielded by fixture design or other means to reduce illumination of surrounding areas. Therefore, the impact is *less than significant*.

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 2. | Substantially damage scenic resources, within a designated scenic corridor or public view shed area including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response F-1 above.

- | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 3. | Substantially degrade the existing visual character or quality of the site and its surroundings, including substantial change in topography or ground surface relief features, and/or development on a ridgeline? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See response to F-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response to F-1 above.

G. CULTURAL RESOURCES

Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to historical resources that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Any proposed addition or modification of the two historical residences would have to be conducted in accordance with County Code Chapter 16.42, Historic Preservation, which requires a valid Historic Resource Preservation Plan approved by the Historic Resources Commission to make any such modifications. If a proposed project involved demolition of either of these structures, the following additional reports would be required: (1) a Special Inspections Report on the condition of the structure and (2) a Historical Documentation Report that documents the claim that preservation is not feasible and provides for the preservation of the historic values of the structure.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in any potentially significant historical resource impacts, as these measures would not change or otherwise affect these historical resources. Therefore, the impact is *less than significant*.

- 2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

The potential for archaeological resources to occur exists throughout the Project Units (see Section II, Table 1). Further, a cultural resources records search of all pertinent survey and site data was conducted for this project at the Northwest Information Center, Sonoma State University, on February 10, 2009. The records were accessed by utilizing the Felton USGS 7.5-minute quadrangle map and included the Sandhills project area along with a ¼ mile radius around the Project Units. In addition to Information Center maps and site record forms, other sources that were reviewed included: the Directory of Properties in the Historic Property Data File for Santa Cruz County, the National Register of Historic Places, the California Register of Historic Resources, the California Inventory of Historic Resources (1976), the California Historical Landmarks (1996), and the California Points of Historical Interest (1992).

The Native American Heritage Commission (NAHC) was contacted on March 20, 2009 and requested to provide information on locations of importance to Native Americans and a list of Native Americans that should be contacted. The NAHC sacred lands search failed to identify any traditional properties in the project area. The NAHC provides a list of Native American organizations that should be contacted concerning locations of importance to Native Americans in the project area. A letter to each organization on the NAHC list was sent on March 24, 2009, providing information

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

about the proposed project and requesting information on locations of importance to Native Americans. To date, two responses have been received by phone. A member of the Indian Canyon Mutsun Band of Costanoan, expressed interest in being notified of any excavation in the Project Units and would like to monitor those activities. A member of the Amah Mutsun Tribal Band, requested to be notified of any discoveries during excavation. Neither respondent had any specific information on known properties within the Project Units.

Approximately fifty studies have been conducted within the ¼-mile radius of the Project Units. The types of cultural resource sites recorded in the Sandhills project area include, but are not limited to, Native American village sites, temporary camp sites, lithic scatters, and historic settlement features. The landscape within the Sandhills area was radically different prior to development, and as a result, areas that appear disturbed may still harbor significant resources.

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to archaeological resources that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

County Code Chapter 16.40, Native American Cultural Sites, requires that archeological surveys be conducted for all discretionary projects located in areas with mapped archeological sensitivity and for which ground disturbance would occur. Such surveys are also required for any project, which would result in ground disturbance within 500 feet of a recorded Native American cultural site. Archeological reports are required prior to the issuance of any project permits when a project site contains a culturally significant site and when development of the project would result in the disturbance of the site. Permit conditions for such a project would be based on the archeological report and consultation with local Native California Indian groups. Conditions shall include but not be limited to those stated in Chapter 16.40.035:

- a. All appropriate preservation or mitigation measures. Preservation could occur through project design or restriction on use and/or grading to avoid the site. Preservation could also occur by having the site excavated by a professional archaeologist to preserve a sample of the remains, artifacts, etc., only as authorized by an Archaeological Excavation Permit.
- b. A provision that if previously undiscovered human remains are encountered during the course of excavation or development, the responsible persons shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director per County Code Chapter 16.40.040.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

If the remains are not of recent origin, a full archeological report shall be prepared and representatives of the local Native California Indian group shall be contacted. Disturbance shall not resume until the significance of the archeological resource is determined and appropriate mitigations to preserve the resource on the site are established.

- c. A provision that the applicant pay the full costs of any preservation or mitigation measures.

Likewise, Chapter 17.44, Cultural Resource Preservation, of the Scotts Valley Municipal Code identifies similar requirements for cultural resource reports, permits when significant resources are present, and discovery of previously unidentified resources or human remains during construction. Compliance with these County and City code standards, as part of the issuance of building and discretionary permits, would help to ensure that all growth and development in the IPHCP Project Units, including that associated with the Covered Activities, would not cause an adverse change in the significance of an archaeological resource.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in any potentially significant archaeological resource impacts. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would further reduce the overall amount of ground disturbance. As a result, the potential for inadvertent discovery of archaeological resources could potentially be reduced with the implementation of the IPHCP minimization and mitigation measures. Therefore, the impact is *less than significant*.

- 3. Disturb any human remains, including those interred outside of formal cemeteries?

See Response G-2 above.

- 4. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no unique paleontological resources or unique geological features mapped or otherwise known to be on or adjacent to the Project Units. Therefore, *no impact is anticipated*.

H. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- 1. Create a significant hazard to the public or the environment as a result of the routine transport, use or disposal

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

of hazardous materials?

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations, if any, pertaining to hazardous materials use that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

The ITPs would cover qualified residential projects located within the Project Units. These types of residential uses would result in the use of small amounts of cleaning fluids and other chemicals that are common for household uses. These projects would not result in the transport, storage, use, or disposal of hazardous materials in any significant quantities. Additionally, both the County and the City have policies and programs to facilitate the safe disposal of household hazardous wastes. Therefore, no significant hazard to the public or environment would occur as result of growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not create a significant hazard to the public or environment as a result of the transport, storage, use, or disposal of hazardous materials, as these measures would not change or otherwise affect such use on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response H-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

See Response H-1 above.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

One parcel, located within the Ben Lomond South Project Unit, is on the 2009 list of hazardous sites in Santa Cruz County compiled pursuant to the specified code. The other Project Units do not contain any parcels that are on this list (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations, if any, pertaining to existing or future contamination that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

As indicated above, one parcel is on the 2009 list of hazardous sites in Santa Cruz County. Regardless of whether or not Covered Activities take place on this parcel, cleanup of the contamination is required under County Code Chapter 7.1, Hazardous Materials-Hazardous Waste-Underground Storage Tanks. Similar cleanup under this chapter would be required if any future releases of hazardous materials occurs in the Project Units under County jurisdiction. Likewise, if any future releases of hazardous materials occurs in the Project Units under City jurisdiction, cleanup under City Municipal Code Chapter 13.12, Hazardous Materials Storage Permit, would be required.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not create a significant hazard to the public or environment as a result of exposure to existing contamination, as these measures would not change or otherwise affect exposure to such contamination on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 5. For a project located within an airport land use plan or, where such a plan | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The Project Units are not located within two miles of a public or private airport. The closest private airports are located in Bonny Doon and Davenport. Therefore, there is *no impact*.

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 6. | For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response to H-5 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 7. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the IPHCP and issuance of the associated ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Future development proposals would have to comply with all applicable emergency response requirements (e.g., adequate access for emergency response vehicles). Consequently, the project would not impair or interfere with implementation of any emergency response plans, and the impact is *less than significant*.

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 8. | Expose people to electro-magnetic fields associated with electrical transmission lines? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to electro-magnetic fields that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Given that the Project Units include residential areas in already densely developed areas, it is unlikely that proposed Covered Activities would be located in proximity to

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

electrical transmission lines. If a new residential structure were proposed in proximity to a transmission line and potentially hazardous electro-magnetic fields, County General Plan Policy 6.8.3 would require that the habitable development envelope be located away from any potentially hazardous fields. Alternatively, powerlines could be relocated or undergrounded to minimize exposure. City General Plan Policies PSP-586 through PSP-587 also make provisions for undergrounding of existing power lines.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not create a significant hazard to the public related to electro-magnetic fields associated with transmission lines, as these measures would not change or otherwise affect such conditions on parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 9. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Portions of some of the Project Units are located in fire hazard areas (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to fire hazards that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Future residential projects covered by the ITPs would incorporate all applicable fire safety code requirements and would include fire protection devices as required by the local fire agencies. Further, these projects would be built in existing densely developed residential areas within existing service areas and infrastructure. Therefore, growth and development in the IPHCP Project Units, including that associated with the Covered Activities, should not create or increase potential fire hazards.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not create

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

a significant hazard to the public related to fire, as these measures would not change or otherwise affect such conditions on parcels in the Project Units. Therefore, the impact is *less than significant*.

I. TRANSPORTATION/TRAFFIC

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to traffic that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

The ITPs would cover qualified residential projects located within the Project Units over an interim period. Covered residential projects that result in new bedrooms (e.g., a new single family residence) could create a small incremental increase in traffic on nearby roads and intersections. However, given the limited number of new trips likely to be associated with Covered Activities and the fact that any new trips would be distributed throughout the Project Units, it is expected that this increase would not cause the Level of Service at any nearby intersection to drop below Level of Service D. Level of Service D is the County’s level of service standard under County General Plan Policy 3.12.1.

Additionally, the Circulation Element of the County General Plan and the Local Coastal Program Land Use Plan includes policies and programs to establish a transportation system which would: (1) accommodate the travel demands of cumulative development projected by the County General Plan (including projects covered by the ITP), (2) reduce traffic congestion, (3) promote mass transit and non-vehicular modes of transportation such as pedestrian and bicycle use, and (4) be within the County’s

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

ability to finance and operate. In particular, County Code Chapter 15.12, Transportation and Roadside Improvement Fees, requires that new developments mitigate their impacts on transportation and roadside facilities through assessment of fees on new development, which fund identified system improvements. Any residential projects covered by the County's ITP that result in new bedrooms would be subject to this fee assessment. The fees have been established and are regularly updated such that they reflect the reasonable cost of mitigating the impacts of new development on transportation-related facilities.

The City of Scotts Valley General Plan also has policies and programs that seek to establish an integrated transportation system capable of accommodating existing and projected needs of the planning area. A similar impact fee program is in place in the Scotts Valley Municipal Code Chapter 16.58, Impact Mitigation Fees, to ensure that a given project that entails one or more new residential units pays its fair share of the cost of traffic improvements necessary to accommodate cumulative growth in the planning area.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not create a significant impact related to traffic, as these measures would not change or otherwise affect traffic conditions in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 2. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response H-5 above.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the IPHCP and issuance of the associated ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Future development proposals would have to comply with all applicable land use provisions, regulatory requirements, and roadway design criteria. Consequently, the project would not substantially increase hazards due to a design feature or incompatible land use, and the impact is *less than significant*.

- | | | | | |
|-----------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. Result in inadequate emergency | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|-----------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

access?

See response to H-7 above.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. Cause an increase in parking demand which cannot be accommodated by existing parking facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to parking that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Under County and City codes, future residential projects covered by the ITPs would be required to comply with any parking requirements relevant to the applicable zoning districts and as applicable to the type of project being pursued. Therefore, any new parking demand generated by future residential projects covered by the ITPs would be accommodated on or in the immediate vicinity of the subject parcels. Covered Activities would not result in an increase in parking demand in existing parking facilities (e.g., parking lots, parking structures, etc.).

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not create a significant impact related to parking, as these measures would not change or otherwise affect parking conditions in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to roadway hazards that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Any future projects covered by the ITPs would be required to comply with current driveway, parking, and road requirements, as relevant, to prevent potential hazards to motorists, bicyclists, and/or pedestrians.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not create a significant impact related to hazards to motorists, bicyclists, or pedestrians, as these measures would not change or otherwise affect such conditions in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 7. Exceed, either individually (the project alone) or cumulatively (the project combined with other development), a level of service standard established by the County General Plan for designated intersections, roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response H-1 above.

J. NOISE

Would the project result in:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to noise that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

The ITPs would cover qualified residential projects located within the Project Units. It is possible that projects covered by the ITPs could create a small incremental permanent increase in the existing noise environment. However, any increase would be small,

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

and would be similar in character to noise generated by the surrounding existing residential uses. Noise generated during construction of Covered Activities would temporarily increase the ambient noise levels in immediately adjoining areas.

It is also possible that future Covered Activities could be located on parcels that experience noise levels in excess of State, County and/or City noise standards due to adjacent traffic noise or other existing or future sources of noise. Per County policy, average hourly exterior noise levels shall not exceed the General Plan threshold of 50 Leq during the day and 45 Leq during the nighttime. Impulsive noise levels shall not exceed 65 db during the day or 60 db at night. Per County General Plan Policy 6.9.2, acoustical studies would be required for all new development with an existing or future Ldn noise exposure greater than 60 dB. The studies must comply with requirements of Title 24 of the California Code of Regulations, which stipulates that interior noise levels for residential uses would not exceed 45 dBA. An acoustic engineer would be required to measure actual noise levels at the project site and recommend construction techniques that would ensure compliance with noise standards.

The City of Scotts Valley General Plan policies NP-451 and NA-452 indicate that where the annual day-night noise level exceeds 60 dBA, the City shall require an acoustical engineering study for proposed new construction or renovation of structures. As for the County, these studies must recommend methods to reduce the interior day-night annual average noise levels to below 45 dBA for residences and other noise sensitive uses in order to meet state requirements.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and the specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not create a significant impact related to noise, as these measures would not change or otherwise affect such conditions in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the IPHCP and issuance of the associated ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Future development proposals would be residential in nature and, in all likelihood, would employ conventional construction techniques. Consequently, the project would not expose people to excessive groundborne vibration or noise levels, and the impact is *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. Exposure of persons to or generation of noise levels in excess of standards established in the General Plan or noise ordinance, or applicable | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

standards of other agencies?

See Response J-1 above.

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. | A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response J-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 5. | 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 expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response H-5 above

- | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 6. | For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See Response H-5 above

K. AIR QUALITY

Where available, the significance criteria established by the Monterey Bay Unified Air Pollution Control District (MBUAPCD) may be relied upon to make the following determinations. Would the project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Santa Cruz County is located in the North Central Coast Air Basin (NCCAB), which also includes Monterey and San Benito counties. Within the NCCAB, the Monterey Bay Unified Air Pollution Control District (MBUAPCD) is responsible for ensuring that the state and Federal air pollutant emissions standards are not violated. The North Central Coast Air Basin does not meet State standards for ozone and particulate matter (PM₁₀) and therefore is a non-attainment area for these standards. Regional pollutants of concern that are emitted by various activities in the Basin include ozone precursors (Volatile Organic Compounds [VOCs] and nitrogen oxides [NOx]), and dust.

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to air quality that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Regional pollutants of concern that would be emitted by Covered Activities are ozone precursors and dust. Given the limited amount of new traffic that would be generated by future residential projects covered by the ITPs (see Response H-1 above), there is no indication that new emissions of VOCs or NOx would exceed Monterey Bay Unified Air Pollution Control District (MBUAPCD) thresholds for these pollutants. For example, the MBUAPCD CEQA Air Quality Guidelines provide a range of different land use types and sizes that could result in potentially significant ozone impacts (MBUAPCD 2008). These indicate that for new single-family development, 810 new dwelling units could potentially generate indirect sources of ozone precursors sufficient to result in significant impacts on ozone. Given that 90 percent of the qualifying parcels in the Project Units are already developed, only about 320 new single-family residences could result if all of the undeveloped parcels were developed under the ITPs (IPHCP Table 1).

Construction of future residential projects covered by the ITPs may result in short-term, localized decreases in air quality due to the generation of dust. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet or 0.3 acres per parcel. Therefore, grading and excavation on individual parcels would not exceed the MBUAPCD's PM₁₀ threshold of 2.2 acres per day. However, dust from grading operations must be controlled per County Code Chapter 16.20, Grading Regulations and per City Municipal Code Chapter 15.06, Excavation, Grading, Erosion, and Sediment Control Regulations. Standard dust control best management practices would be implemented during construction to reduce dust emissions per these regulations.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not result in potentially significant impacts related to an exceedance of an air quality standard. The IPHCP would limit the development envelopes of Covered Activities to 15,000 square feet per parcel and the IPHCP minimization measures would further reduce the overall amount of ground disturbance and associated generation of PM₁₀ emissions during construction. As a result, the implementation of the IPHCP minimization and mitigation measures would not contribute substantially to an existing exceedance of an air quality standard. Therefore, the impact is *less than significant*.

2. Conflict with or obstruct

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

implementation of the applicable air quality plan?

See Response K-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. | 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response K-1 above..

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. | Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response K-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. | Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to odor control that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Future residential projects covered by the ITPs would not likely create objectionable odors affecting substantial numbers of people. Objectionable odors could potentially be generated by residential uses if animals are kept and not properly cared for or maintained. However, all uses would be required to comply with animal regulations, such that objectionable odors are not generated, per County Code Chapter 13.10, Zoning Regulations and per City Municipal Code Chapter 17.46, Exceptions and Modifications.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in potentially significant impacts related to odors, as these measures would not change or otherwise affect odorous conditions on parcels in the Project Units. Therefore, the

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

impact is *less than significant*.

L. GREENHOUSE GAS EMISSIONS

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| 1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|--------------------------|

Implementation of the IPHCP and issuance of the associated ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Most of the parcels within the Project Units have already been developed, and future development projects would be residential in nature. These projects, like all development, would be responsible for an incremental increase in green house gas emissions by usage of fossil fuels during the site grading and construction. At this time, Santa Cruz County is in the process of developing a Climate Action Plan (CAP) intended to establish specific emission reduction goals and necessary actions to reduce greenhouse gas levels to pre-1990 levels as required under AB 32 legislation. Until the CAP is completed, there are no specific standards or criteria to apply. All future development projects would be required to comply with the Regional Air Quality Control Board emissions requirements for construction equipment. Therefore, impacts associated with the temporary, construction-related increase in green house gas emissions is expected to be *less than significant*.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response L-1 above.

M. PUBLIC SERVICES

Would the project:

- | | | | | |
|--|--|--|--|--|
| 1. 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: | | | | |
|--|--|--|--|--|

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks or other recreational activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities; including the maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to public services and utilities that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

While Covered Activities represent an incremental contribution to the need for services, the increase would be minimal given the nature, extent, and location of residential projects and the interim time frame of the ITPs. Additionally, the future residential projects would be constructed in existing densely developed residential areas within existing service areas that already receive services and have existing infrastructure. Moreover, Covered Activities would incorporate all applicable fire safety code requirements and would include fire protection devices as required by the local fire agencies or California Department of Forestry, as applicable. The local fire agencies or California Department of Forestry, as appropriate, would review and approve project plans for future residential projects covered by the ITPs, to assure conformity with fire protection standards, which include minimum requirements for water supply for fire protection, fire service access, etc.

Further, applicants seeking coverage under the ITPs would be required to pay school, park, and transportation fees in conformance with Santa Cruz County Code and the Scotts Valley Municipal Code. Fees collected from Covered Activities, in conjunction with other fees collected, would be used to offset the incremental increase in demand for school and recreational facilities and public roads. If new or expanded public service facilities are required as a result of planned growth in the service areas, including that related to the Covered Activities, the environmental effects of such

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

facilities would be evaluated under CEQA at the time that they are proposed.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in potentially significant impacts related to public services, as these measures would not change or otherwise affect public service requirements in the Project Units. Therefore, the impact is *less than significant*.

N. RECREATION

Would the project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response M-1 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 2. | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Implementation of the IPHCP and issuance of the associated ITPs would not include construction or expansion of recreational facilities. Therefore, there is *no impact*.

O. UTILITIES AND SERVICE SYSTEMS

Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Responses A-4 and B-7 above.

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. | Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

Lorenzo Valley Water District, the Mt Hermon Water System, the Scotts Valley Water District (see Section II, Table 1), or from private wells. Future Covered Activities would obtain sewer services from County Service Area 10, Scotts Valley Sewer, Mt. Hermon Sewage System, or from private septic systems (see Section II, Table 1).

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to water or wastewater facilities that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Although Covered Activities may incrementally increase water demand, this increase is not expected to be substantial given the nature and extent of the residential projects and the interim time frame of the ITPs. Additionally, given that Covered Activities have already been contemplated in the City and County general plans, it is expected that the various water agencies have accounted for this growth in their water supply planning. While that is the case, County General Plan policies 7.18.2 and 7.18.3 require written commitments from water service providers of adequate water availability and assessment of impacts on municipal water systems prior to project approval.

Additionally, City General Plan policies PSP-559, PSA-560 through PSA-567, and PSP-568 seek to promote the provision of adequate water service for residents through cooperation with water districts that serve the area and by requiring new service connections for discretionary projects in order to minimize the effects of private well development on basin-wide groundwater resources. Further, City General Plan policies OS0-336 through OSP-346 require protection of watersheds and recharge areas through various programs, mitigation for loss of recharge associated with development, and minimizing new impervious surfaces associated with new development.

The wastewater flows from Covered Activities would not violate any wastewater treatment standards. Although Covered Activities may incrementally increase sewer system demand, this increase is not expected to be substantial given the nature and extent of the residential projects and the interim time frame of the ITPs. Additionally, given that Covered Activities have already been contemplated in the City and County general plans, it is expected that the various sewer agencies have accounted for this growth in their system planning. While that is the case, County General Plan Policy 7.19.1 requires written commitments from sewer service providers of adequate system capacity prior to project approval and County Policy 7.19.2 requires that new development pay its fair share of downstream sewer system improvements, if needed.

Provision of adequate sewer services in the City of Scotts Valley is provided for

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

through the City’s Wastewater Plan, which is monitored and updated annually per City General Plan Policy PSA-571 to meet the demands of the service area. Improvements are planned and funding proposed to ensure that adequate levels of service are available to meet the demands of the service area per City General Plan Policy PSA-572.

If new or expanded water supply or sewer facilities are required as a result of planned growth in the service areas, including that related to the Covered Activities, the environmental effects of such facilities would be evaluated under CEQA at the time that they are proposed.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP’s operating conservation program would not result in potentially significant impacts related to the need for new water or wastewater treatment facilities, as these measures would not change or otherwise affect these facilities that serve parcels in the Project Units. Therefore, the impact is *less than significant*.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. | Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response O-2 above.

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 4. | Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response O-2 above

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 5. | Result in 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response O-2 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 6. | Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

needs?

IPHCP COVERED ACTIVITIES

As indicated in the Introduction to Section III above, the issuance of the ITPs would not result in the authorization of any specific Covered Activities or development above and beyond that already allowed under the existing approved general plans. Therefore, the project would not result in or otherwise cause direct, indirect or secondary effects associated with such Covered Activities. However, for information purposes, this subsection of the Initial Study provides a summary of existing County and City policies, programs, and regulations pertaining to landfill facilities that are in place to address all growth and development in the IPHCP Project Units, including that associated with the Covered Activities.

Future Covered Activities would make an incremental contribution to the reduced capacity of regional landfills. However, this contribution would be relatively small and would be of similar magnitude to that created by existing residential land uses in and around the Project Units. Further, given that any development covered by the ITPs has already been contemplated in the City and County general plans, it is expected that the County and City public works agencies have accounted for this growth in their municipal solid waste planning efforts.

IPHCP MINIMIZATION AND MITIGATION MEASURES

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not result in potentially significant impacts related to landfill capacity or solid waste management regulations, as these measures would not change or otherwise affect the capacity of these facilities or related regulatory compliance. Therefore, the impact is *less than significant*.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 7. Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response to 0-6 above.

P. LAND USE AND PLANNING

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

See Response to C-6 above.

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. | Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

See Response to C-7 above

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 3. | Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Implementation of the IPHCP and specific minimization and compensatory mitigation measures of the IPHCP's operating conservation program would not physically divide an established community, as the IPHCP would not change or otherwise affect community structure within the Project Units. Therefore, the impact is *less than significant*.

Q. POPULATION AND HOUSING

Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. | Induce substantial 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)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|----|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The IPHCP and ITPs would not cause growth or otherwise be growth inducing, as they would not result in: (1) the authorization of growth or the approval of any specific development project, (2) growth above and beyond that allowed under existing approved general plans of the County and City, and/or (3) the removal of an existing obstacle to growth. Therefore, the impact is *less than significant*. These aspects of growth inducement are further discussed below.

As indicated above, the IPHCP and ITPs are intended to address the potential incidental take of Covered Species that may result from Covered Activities in the Project Units. However, the issuance of the ITPs would not result in the authorization or approval of any specific development projects or Covered Activities. All future eligible Covered Activities would proceed through the normal discretionary or building permit review and approval processes of the County or City. Individual landowners within the Project Units that pursue development permits for certain small projects during the ITP permit period would have to request coverage under either the County or City ITP and the County or City would have to extend such coverage.

Additionally, Covered Activities constitute development and growth that is already planned for under the general plans of the County and City. The County and City general plan land use designations and zoning would not change with the ITPs and therefore the ITPs would not change (either reduce or increase) the amount of

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

residential development already allowed pursuant to local land use controls. In other words, regardless of whether the ITPs are issued, the same number of dwelling units could ultimately be developed in the Project Units as is currently allowed under the County and City general plans. Additionally, the ITPs would not change the planned location of residential development.

Further, the issuance of the ITPs would not remove an existing obstacle to growth. Currently, the Service advises all private landowners proposing activities that may result in injury or mortality of federally listed animals to prepare an individual HCP and apply for an incidental take permit. A number of ITPs have been recently issued in the Sandhills by the Service and a number of ITP applications are pending (see Response N-3 below for additional information). The IPHCP and ITPs are being developed in an attempt to provide an additional option for landowners that would be more efficient and effective than the traditional permitting process. Landowners would still have the option of developing their own HCP and seeking individual ITPs, or waiting until the County and City have developed and implemented a regional HCP.

While the IPHCP and ITPs would not result in or otherwise cause indirect or secondary effects associated with such induced growth, this Initial Study provides a summary of existing County and City policies, programs, and regulations that are in place to address all new growth and development in the IPHCP Project Units, including that associated with the Covered Activities. It is assumed that Covered Activities within the Project Units would occur consistent with the relevant general plan and local regulations. It should also be noted that for Covered Activities that require discretionary approvals, subsequent compliance with CEQA for individual projects would continue to be required as part of this approval process.

2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Development of Covered Activities in the identified Project Units would proceed in accordance with the existing County and City general plans. As such, the IPHCP would not increase or decrease the number of residential units or change the planned location of residential development. Therefore, issuance of the ITPs and implementation of the IPHCP would not result in displacement of people or housing, and there is *no impact*.

3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See Response Q-2 above.

R. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
1. Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal community, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

See Section III (C), Biological Resources and Section III (F), Cultural Resources for explanation.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
2. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project, consisting of the issuance of the ITPs to the County and the City and the implementation of the IPHCP Operating Conservation Plan, would not have impacts that are individually limited, but cumulatively considerable. Issuance of the ITPs would provide permit coverage under the Act for the take of Covered Species and associated removal and/or disturbance of 139 acres of Sandhills habitat.

Under the ITPs and IPHCP, habitat removal or disturbance would be minimized to the extent possible on a project-by-project basis through a series of minimization measures.

Further, habitat removal or disturbance that does take place would be compensated for at a 1:1 ratio through the purchase of conservation credits at the Service-approved Zayante Sandhills Conservation Bank or another Service-approved conservation bank. The purchase of such credits would compensate for or offset any adverse effects of Covered Activities on the Covered Species, as mitigation fees provided by the purchase of credits would support the on-going conservation and management activities at the Preserve and would contribute to the conservation and recovery of both of the Covered Species. Given that the habitat loss and associated effects on individuals of the Covered

Species would be compensated for through commensurate mitigation, the proposed project would not have a cumulatively considerable contribution to a significant impact. (Section III (C), Biological Resources, provides additional information about the effectiveness of the IPHCPs minimization and mitigation measures.)

Other recent projects in the Sandhills region that have received ITPs are also required to compensate for any permanent loss of habitat for federally endangered species. Approximately 7.5 acres of Mount Hermon June beetle habitat have been approved for removal based on the issuance of ITPs from the Service and local approvals from the County or City. Compensatory mitigation for these projects has included securing conservation credits at the Zayante Sandhills Conservation Bank or providing for the permanent conservation of habitat preserves. Additionally, several mining operations in the Sandhills region that have ITPs are also required to compensate for any permanent loss of habitat through the establishment of on- and off-site conservation areas and on-going monitoring.

The County, City and Service are aware of a number of development projects that have been implemented in the action area by landowners who have not applied for or obtained an ITP. In these cases, it is uncertain as to the amount of Sandhills habitat that has been lost and the number of Mount Hermon June beetles and Ben Lomond spineflowers that have been killed or affected as a result of the development. However, the proposed project would not contribute to these losses, given that minimization measures and compensatory mitigation measures would be required for individual projects to receive coverage under the ITPs. Further, the IPHCP might decrease such losses in the future by providing a more streamlined method of receiving necessary approvals.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
3. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

See Section III (G), Hazards and Hazardous Materials for explanation.

IV. TECHNICAL REVIEW CHECKLIST

	<u>REQUIRED</u>	<u>DATE COMPLETED</u>
Agricultural Policy Advisory Commission (APAC) Review	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Archaeological Review	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Biotic Report/Assessment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Geologic Hazards Assessment (GHA)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Geologic Report	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Geotechnical (Soils) Report	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Riparian Pre-Site	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Septic Lot Check	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____
Other:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	_____

*Technical reviews would be conducted, as applicable, during the normal building permit or discretionary approval processes for future projects that may receive coverage under the ITPs.

V. REFERENCES USED IN THE COMPLETION OF THIS ENVIRONMENTAL REVIEW INITIAL STUDY

Arnold, Richard, A., Ph.D. 2006. *Zayante Sandhills Conservation Bank: Evaluation of Conservation Credits for the Ben Lomond Sandhills Preserve*. April.

City of Scotts Valley. 1994. *1994 City of Scotts Valley General Plan*.

City of Scotts Valley. 2001. *City of Scotts Valley General Plan Map*. May. Prepared by TriAxial Data Systems for the City of Scotts Valley.

City of Scotts Valley. 2007. *City of Scotts Valley Zoning Map*. March. Prepared by TriAxial Data Systems for the City of Scotts Valley. Accessed on <http://www.scottsvalley.org/downloads/planning/ZoningMap.pdf>

City of Scotts Valley. 2009. *City of Scotts Valley Municipal Code*. Amended through Ordinance 183, enacted November 4. Accessed during 2009 and 2010 on <http://www.municode.com/resources/gateway.asp?pid=13736&sid=5%20>

County of Santa Cruz. 1989. *Adopted Santa Cruz County Historic Inventory*.

County of Santa Cruz. 1994. *1994 General Plan and Local Coastal Program for the County of Santa Cruz, California*. Adopted by the County Board of Supervisors on May 24, 1994, and certified by the California Coastal Commission on December 15, 1994.

County of Santa Cruz. 2009. *Santa Cruz County Site Mitigation List*.

County of Santa Cruz. 2009. *Santa Cruz County Code*. Amended through Ordinance 5054, passed August 4, 2009. Accessed during 2009 on <http://www.codepublishing.com/ca/santacruzcounty/>.

McGraw, Jodi, Ph.D. 2004. *Adaptive Management and Monitoring Plan for the Zayante Sandhills Conservation Bank*. April 24.

Monterey Bay Unified Air Pollution Control Board. 2008. *CEQA Air Quality Guidelines*. February.

United States Department of Agriculture, Natural Resources Conservation Service. 1976. *Soil Survey of Santa Cruz County, California*. Accessed during 2009 on <http://www.ca.nrcs.usda.gov/mlra02/stacruz/index.html>.

U.S. Fish and Wildlife Service, County of Santa Cruz, and City of Scotts Valley. *Sandhills Interim Programmatic Habitat Conservation Plan*. January, 2011

United States Fish and Wildlife Service. 2003. *Guidance for the Establishment, Use, and Operation of Conservation Banks*. May.

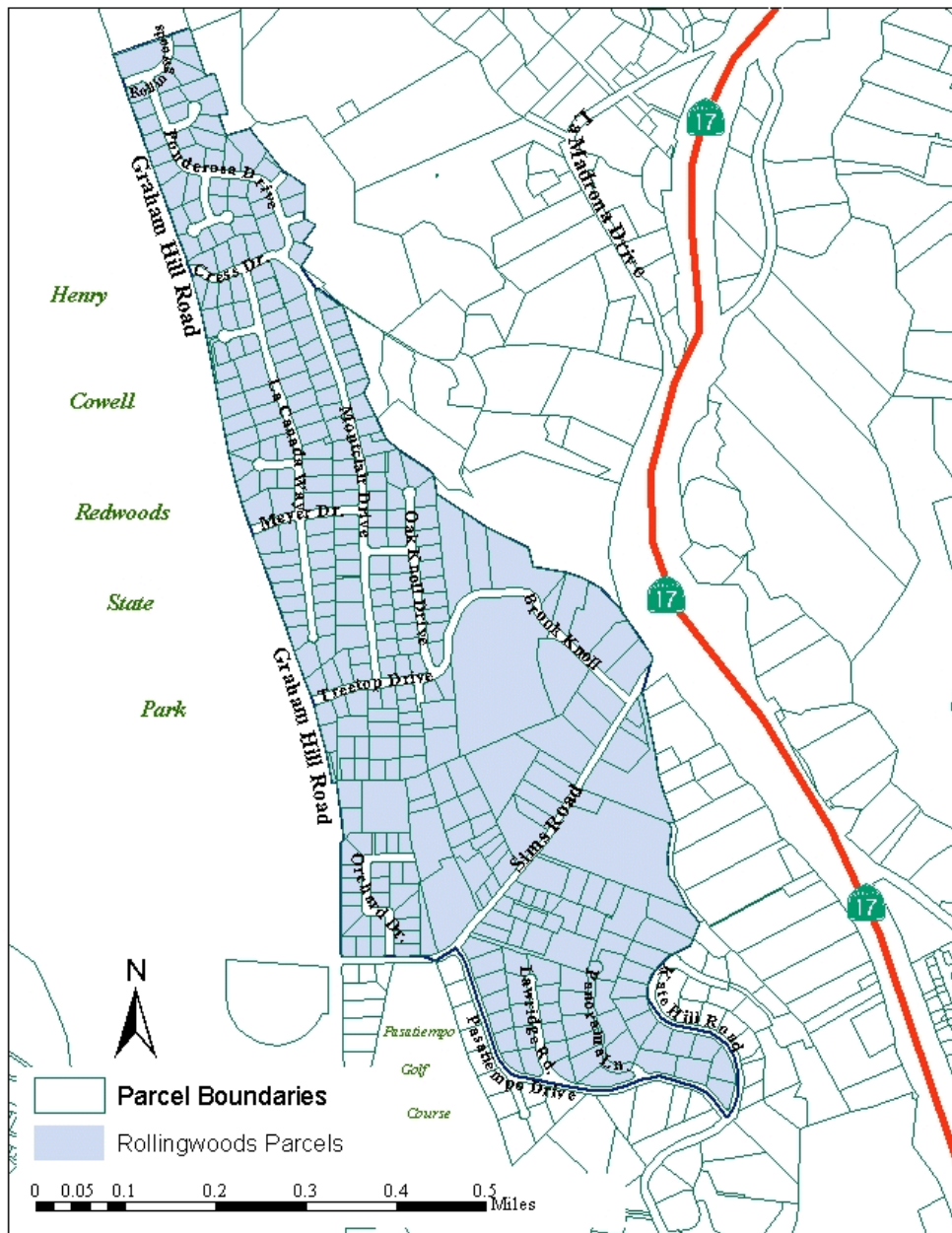
United States Fish and Wildlife Service. 1973. The Endangered Species Act of 1973, as amended (16 U.S.C 1531 *et seq.*).

VI. ATTACHMENTS

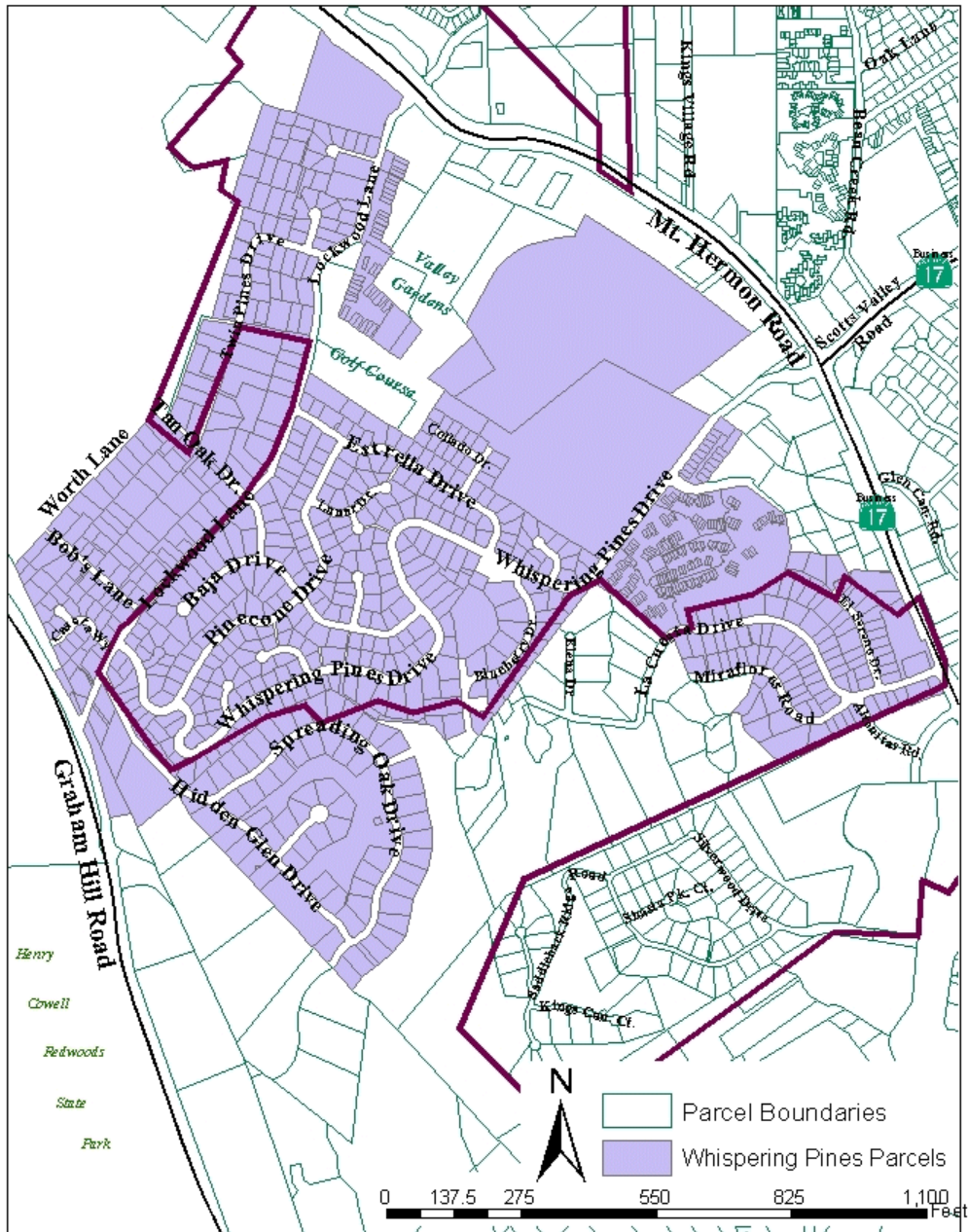
1. IPHCP Project Units

**ATTACHMENT 1
IPHCP Project Units**

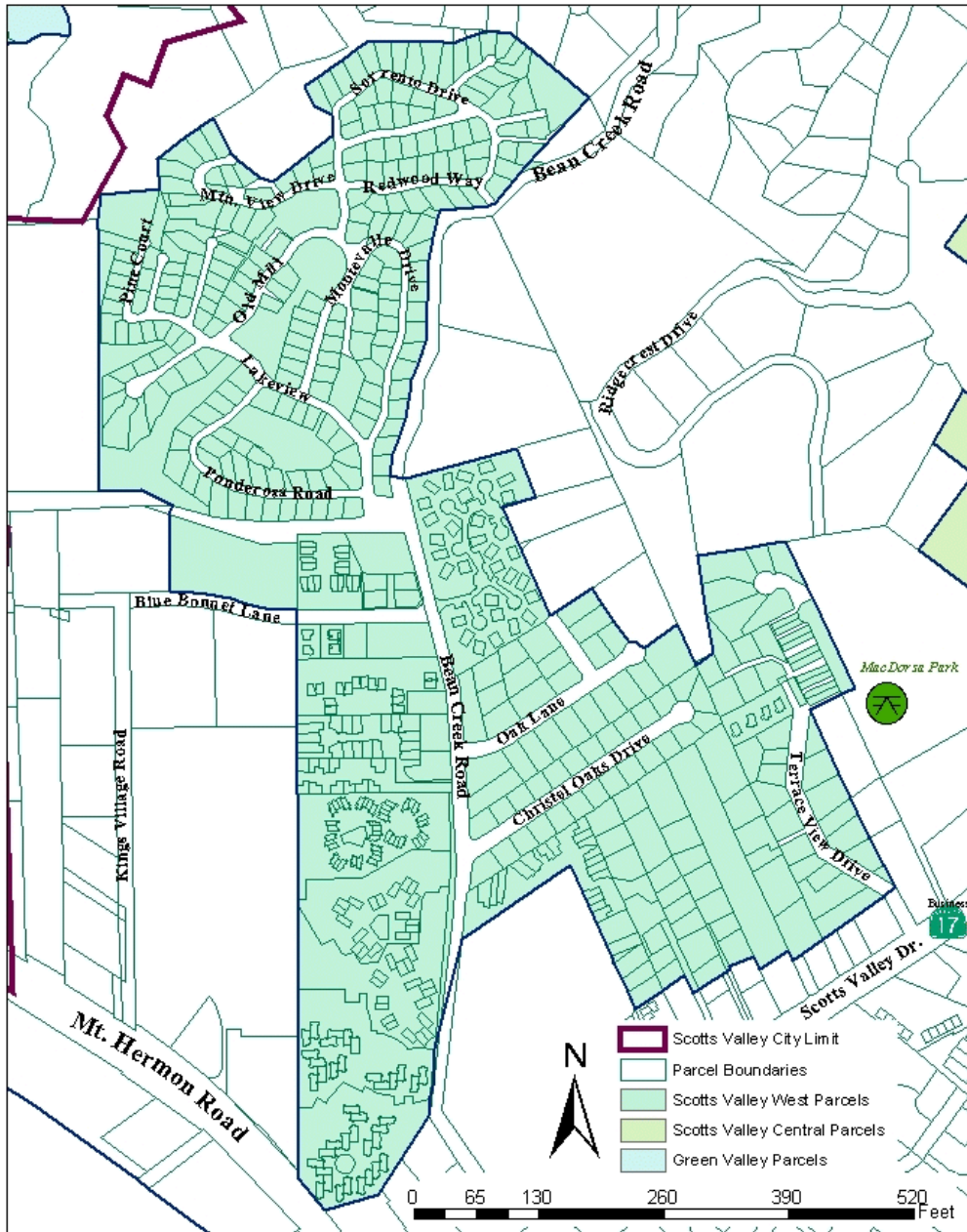
**Figure B-1. Rollingwoods Unit,
IPHCP, Santa Cruz County, California**



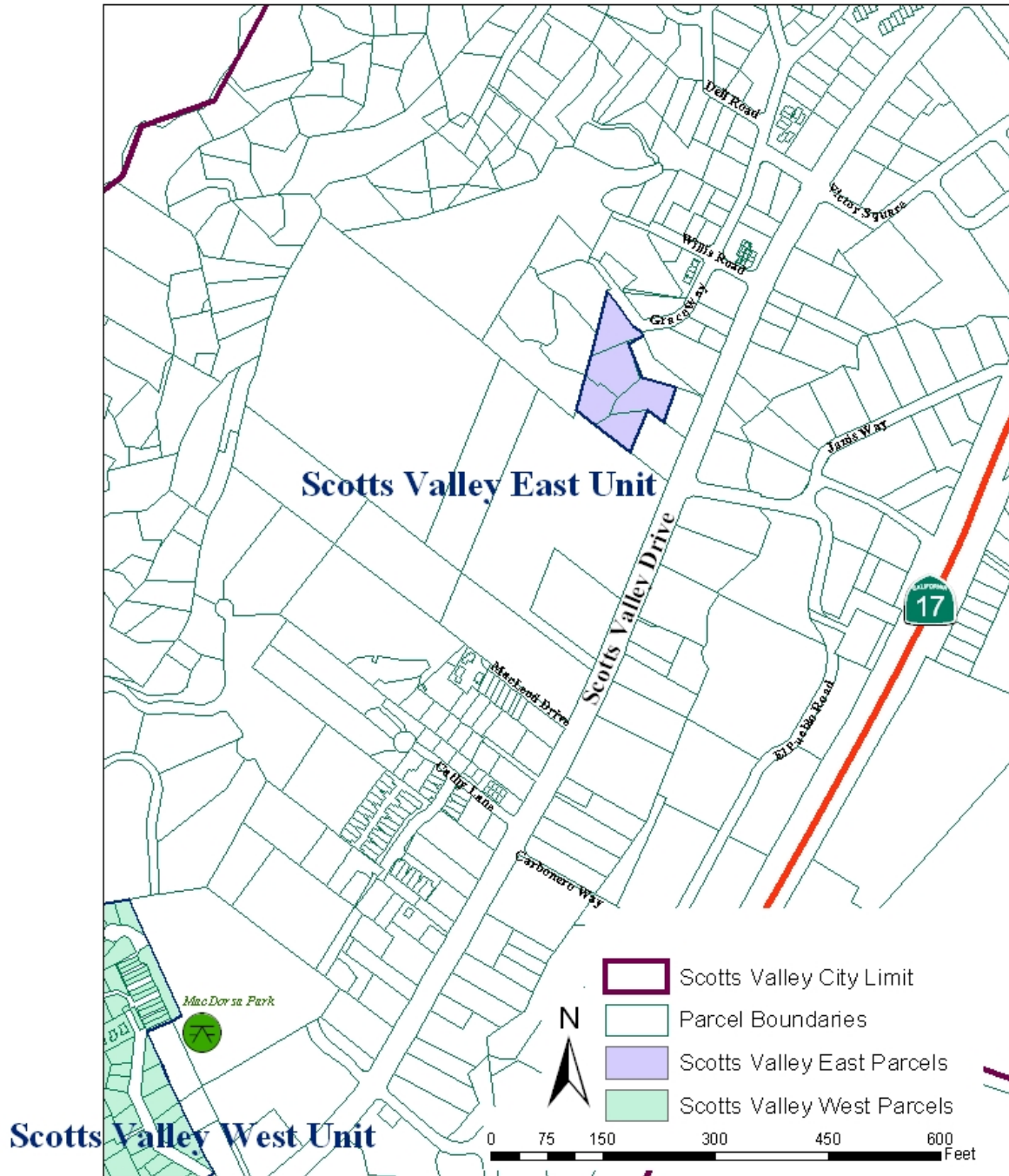
**Figure B-2. Whispering Pines Unit,
IPHCP, Santa Cruz County, California**



**Figure B-3. Scotts Valley West Unit,
IPHCP, Santa Cruz County, California**



**Figure B-4. Scotts Valley East Unit, IPHCP,
Santa Cruz County, California**



**Figure B-5. Green Valley Unit,
IPHCP, Santa Cruz County, California**

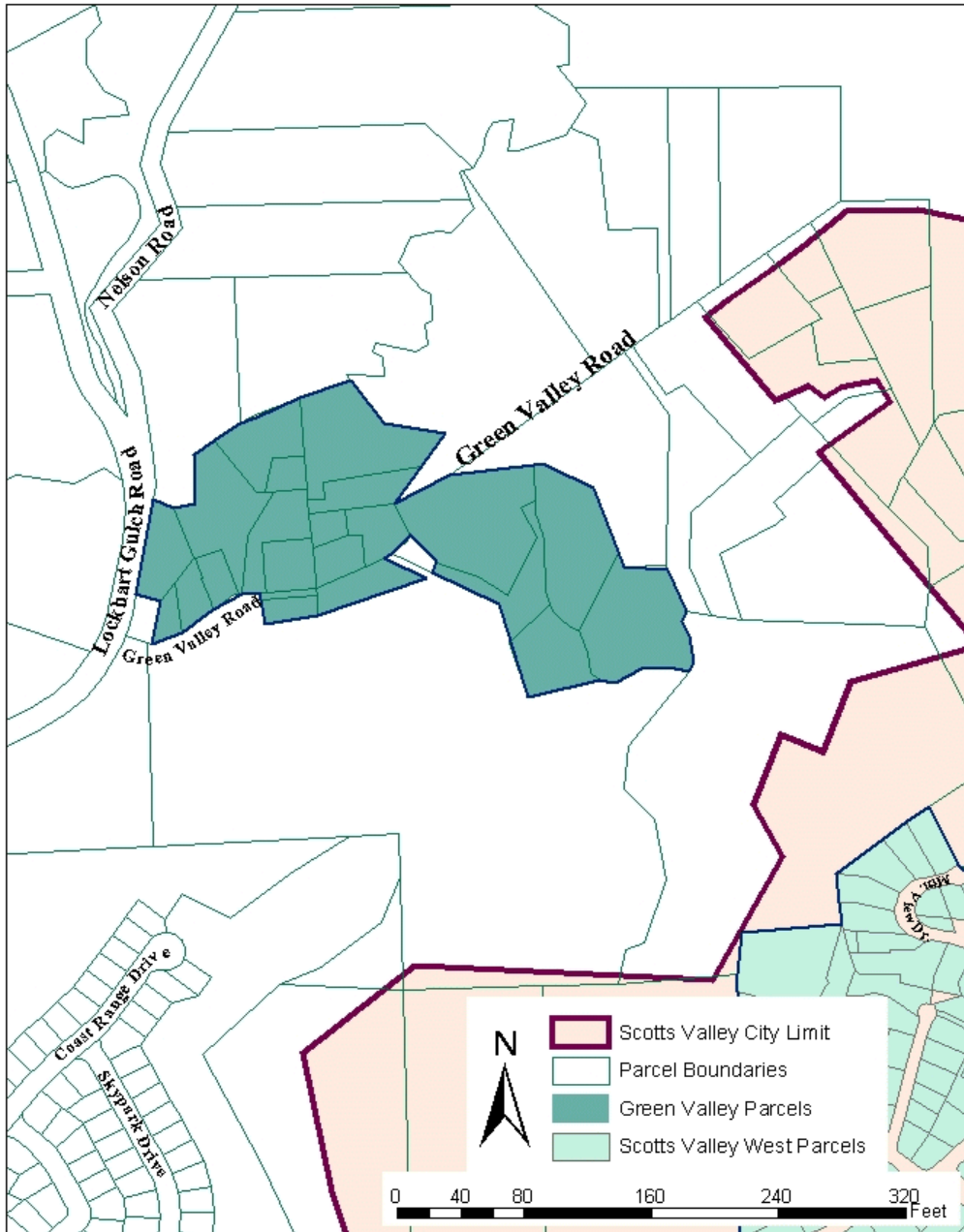
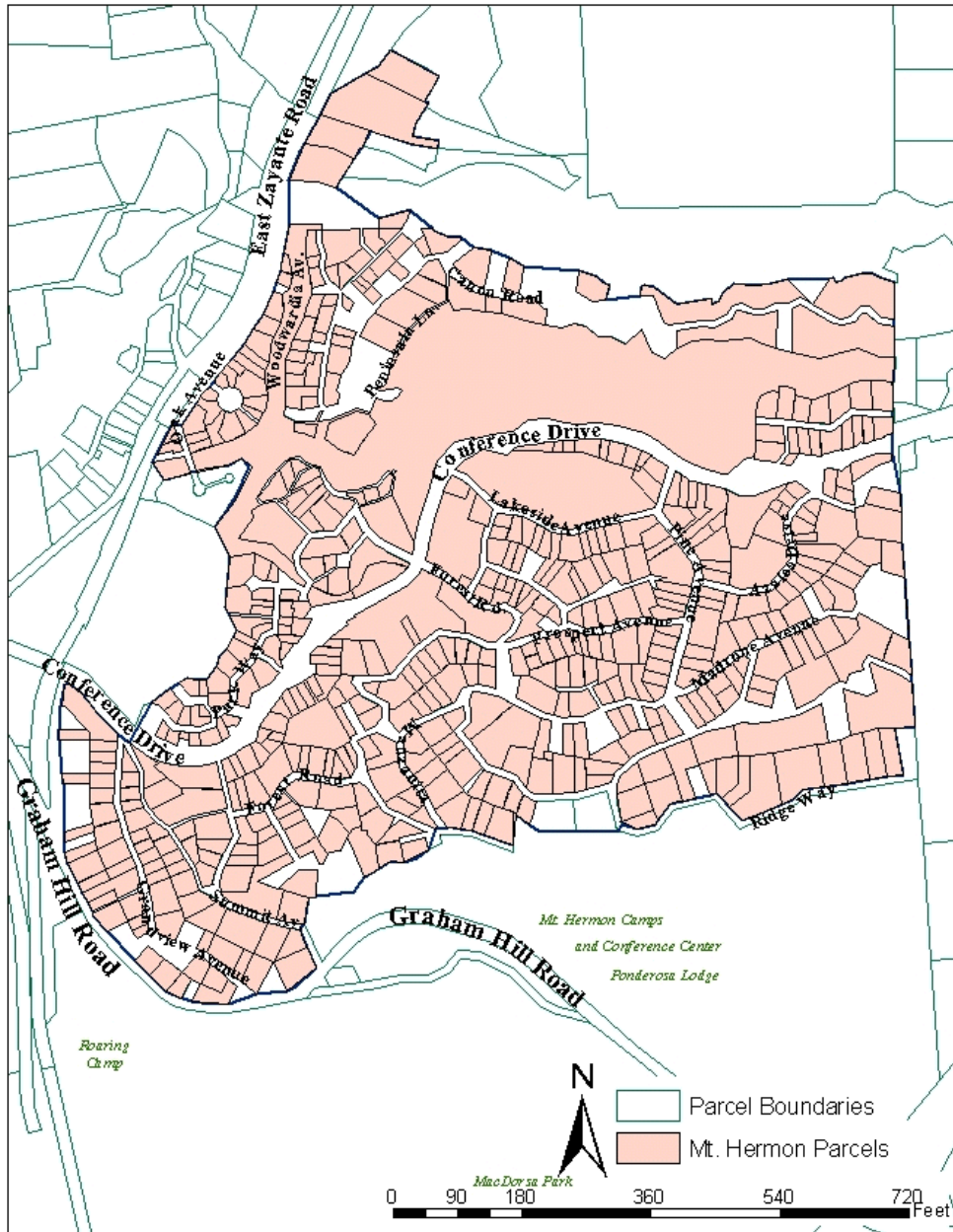
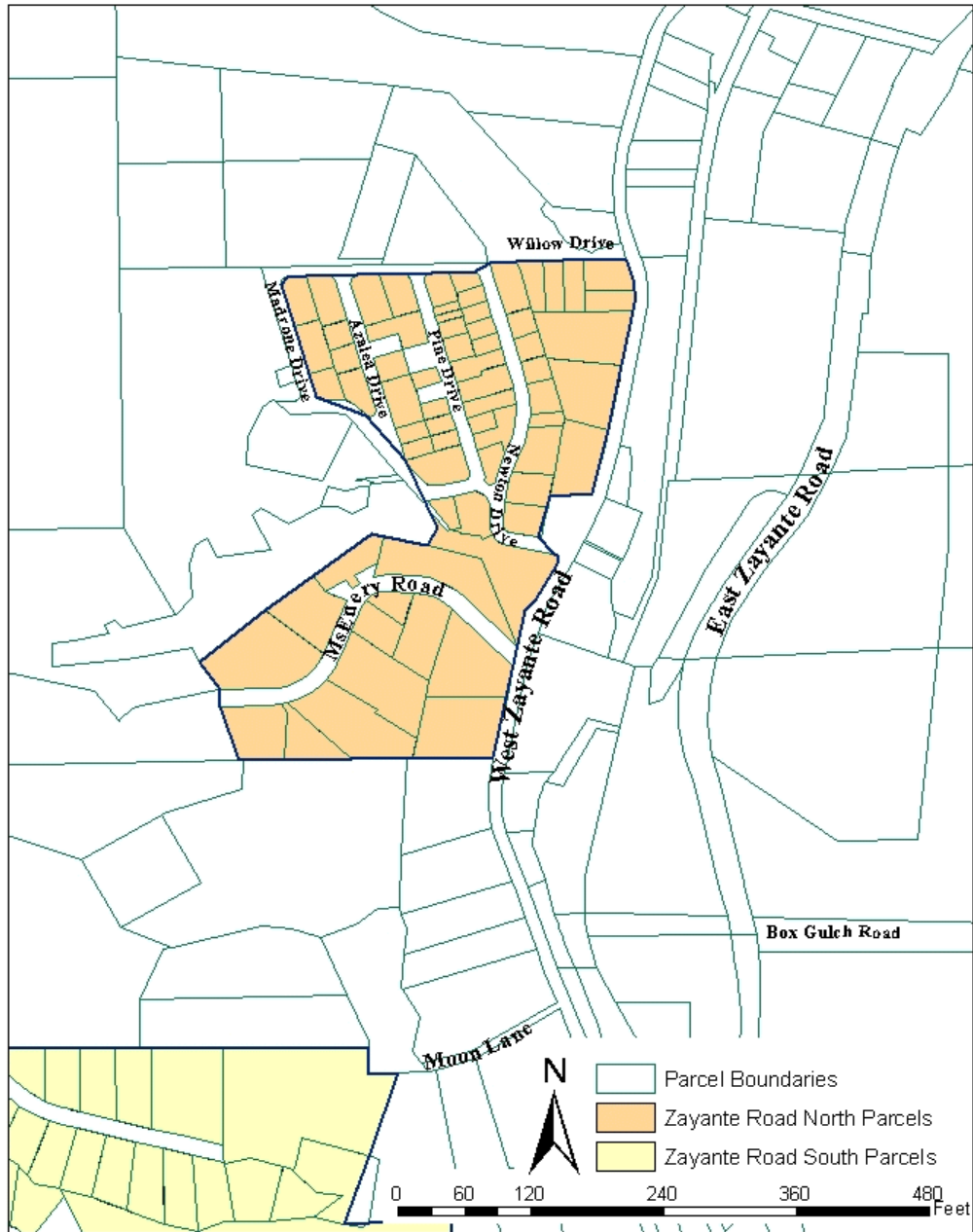


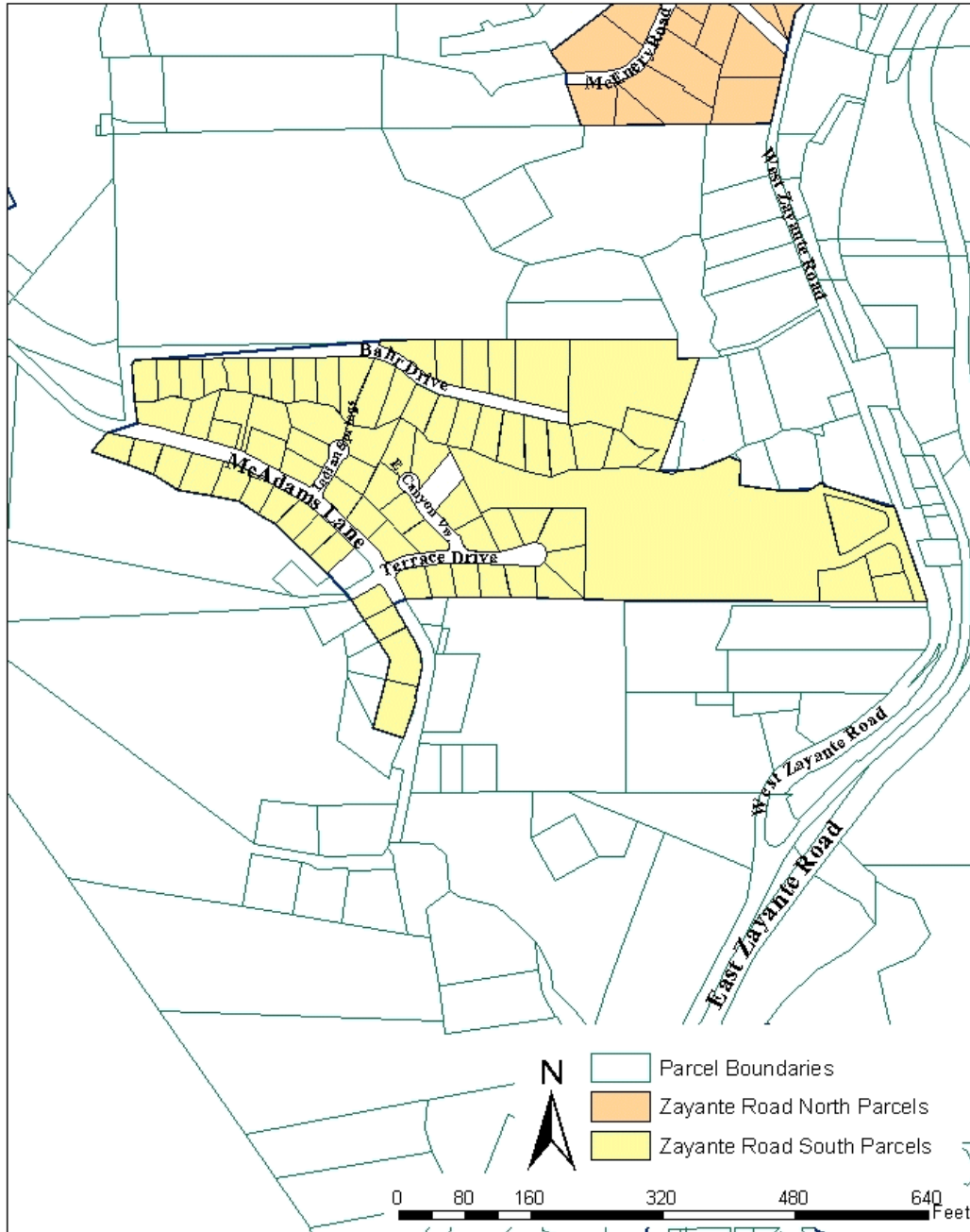
Figure B-6. Mount Hermon Unit, IPHCP, Santa Cruz County, California



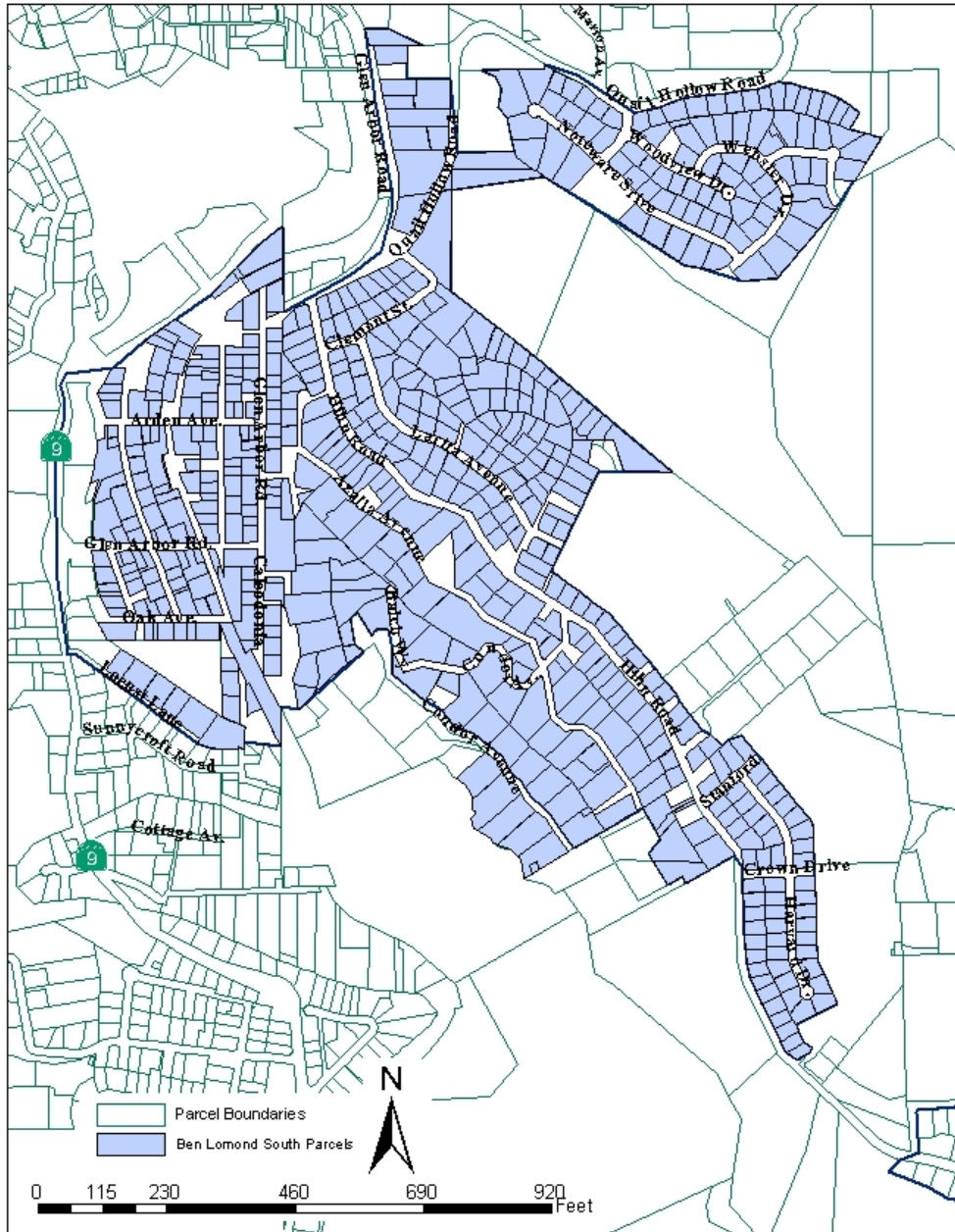
**Figure B-7. Zayante Road North Unit,
IPHCP, Santa Cruz County, California**



**Figure B-8. Zayante Road South Unit,
IPHCP, Santa Cruz County, California**



**Figure B-9. Ben Lomond South Unit,
IPHCP, Santa Cruz County, California**



**Figure B-10. Ben Lomond North Unit,
IPHCP, Santa Cruz County, California**

