County of Santa Cruz

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

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

NOTICE OF PUBLIC REVIEW AND COMMENT PERIOD

Pursuant to the California Environmental Quality Act, the following project has been reviewed by the County Environmental Coordinator to determine if it has a potential to create significant impacts to the environment and, if so, how such impacts could be solved. A Negative Declaration is prepared in cases where the project is determined not to have any significant environmental impacts. Either a Mitigated Negative Declaration or Environmental Impact Report (EIR) is prepared for projects that may result in a significant impact to the environment.

Public review periods are provided for these Environmental Determinations according to the requirements of the County Environmental Review Guidelines. The environmental document is available for review at the County Planning Department located at 701 Ocean Street, in Santa Cruz. You may also view the environmental document on the web at www.sccoplanning.com under the Planning Department menu. If you have questions or comments about this Notice of Intent, please contact Todd Sexauer of the Environmental Review staff at (831) 454-3511.

The County of Santa Cruz does not discriminate on the basis of disability, and no person shall, by reason of a disability, be denied the benefits of its services, programs or activities. If you require special assistance in order to review this information, please contact Bernice Shawver at (831) 454-3137 to make arrangements.

PROJECT: Davenport Gap **APP #: 161248 – 161253; 171059**

APN(S): Public Rights of Way

PROJECT DESCRIPTION: This is a proposal to establish microcell antennas and equipment at seven sites, including six co-located sites and one new site. At two sites (DAV 018 and DAV 019), two co-located antennas would be mounted on utility poles and one equipment cabinet would be mounted on the ground at each site. At one site (DAV 016), two co-located antennas would be mounted on a utility pole, and one H-frame equipment structure would be mounted on the ground behind a wood screen. Two sites (DAV 017 & DAV 021) each would have two co-located, pole-mounted antennas and pole-mounted equipment. One site (DAV 020) would have two co-located, utility pole-mounted antennas and an equipment vault mounted underground. One site (DAV 022) is a new microcell site at which two antennas would be mounted on a new tower camouflaged as a utility pole, and one equipment cabinet would be mounted on the ground.

PROJECT LOCATION: The proposed project involves seven wireless communication facilities (WCF), located in the locations described below. Stated distances are measured from center of intersection. All locations are within unincorporated Santa Cruz County. The County of Santa Cruz is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

161248 (DAV 016): Highway 1 right of way, inland side, approximately 466 feet (0.1 mi.) south of the intersection with Swanton Road.

161249 (DAV 017): Cement Plant Road, southwest (coastal) side, approximately 90 feet south of the intersection with 1st Avenue.

161250 (DAV 018): Highway 1 right of way, inland side, approximately 1,244 feet (0.24 mi.) south of the intersection with Davenport Ave. Meter site located in Old Coast Road right of way (County r.o.w.) approximately 102 feet northeast of the intersection with Highway 1.

161251 (DAV 019): Highway 1 right of way, inland side, approximately 1,147 feet (0.2 mi.) south of the intersection with Laguna Road.

161252 (DAV 020): Highway 1 right of way, inland side, approximately 2,557 feet (0.5 mi.) north of the intersection with Laguna Road.

161253 (DAV 021): San Vicente Street in Davenport, northwest side, approximately 986 feet (0.19 mi.) north of the intersection with Marine View Avenue

171059 (DAV 022): Highway 1 right-of-way at the intersection with Marine View Ave., north side of intersection.
EXISTING ZONE DISTRICT: SU, PF, CA, R-1-6
APPLICANT: Crown Castle (Sharon James)
OWNER: State of California (Caltrans); County of Santa Cruz
PROJECT PLANNER: Jerry Busch, (831) 454-3234
EMAIL: Jerry.Busch@santacruzcounty.us
ACTION: Negative Declaration with Mitigations
REVIEW PERIOD: October 2, 2017 through October 31, 2017

This project will be considered at a public hearing by the Zoning Administrator. The time, date and location have not been set. When scheduling does occur, these items will be included in all public hearing notices for the project.

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
http://www.sccoplanning.com/

MITIGATED NEGATIVE DECLARATION

Project: Davenport Gap **APN(S): Public Rights of Way**

Application No.: 161248 – 161253; 171059

Project Description: This is a proposal to establish microcell antennas and equipment at seven sites, including six co-located sites and one new site. At two sites (DAV 018 and DAV 019), two co-located antennas would be mounted on utility poles and one equipment cabinet would be mounted on the ground at each site. At one site (DAV 016), two co-located antennas would be mounted on a utility pole, and one H-frame equipment structure would be mounted on the ground behind a wood screen. Two sites (DAV 017 & DAV 021) each would have two co-located, pole-mounted antennas and pole-mounted equipment. One site (DAV 020) would have two co-located, utility pole-mounted antennas and an equipment vault mounted underground. One site (DAV 022) is a new microcell site at which two antennas would be mounted on a new tower camouflaged as a utility pole, and one equipment cabinet would be mounted on the ground.

Project Location: The proposed project involves seven wireless communication facilities (WCF), located in the locations described below. Stated distances are measured from center of intersection. All locations are within unincorporated Santa Cruz County. The County of Santa Cruz is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

161248 (DAV 016): Highway 1 right of way, inland side, approximately 466 feet (0.1 mi.) south of the intersection with Swanton Road.

161249 (DAV 017): Cement Plant Road, southwest (coastal) side, approximately 90 feet south of the intersection with 1st Avenue.

161250 (DAV 018): Highway 1 right of way, inland side, approximately 1,244 feet (0.24 mi.) south of the intersection with Davenport Ave. Meter site located in Old Coast Road right of way (County r.o.w.) approximately 102 feet northeast of the intersection with Highway 1.

161251 (DAV 019): Highway 1 right of way, inland side, approximately 1,147 feet (0.2 mi.) south of the intersection with Laguna Road.

161252 (DAV 020): Highway 1 right of way, inland side, approximately 2,557 feet (0.5 mi.) north of the intersection with Laguna Road.

161253 (DAV 021): San Vicente Street in Davenport, northwest side, approximately 986 feet (0.19 mi.) north of the intersection with Marine View Avenue

171059 (DAV 022): Highway 1 right-of-way at the intersection with Marine View Ave., north side of intersection.

Owner: State of California (Caltrans); County of Santa Cruz
Applicant: Crown Castle (Sharon James)
Staff Planner: Jerry Busch, (831) 454-3234
Email: Jerry.Busch@santacruzcounty.us

This project will be considered at a public hearing by the Zoning Administrator. The time, date and location have not been set. When scheduling does occur, these items will be included in all public hearing notices for the project.

California Environmental Quality Act Mitigated Negative Declaration Findings:

Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and, that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment. The expected environmental impacts of the project are documented in the attached Initial Study on file with the County of Santa Cruz Clerk of the Board located at 701 Ocean Street, 5th Floor, Santa Cruz, California.

Review Period Ends: October 31, 2017

Date:_____

_____

TODD SEXAUER, Environmental Coordinator
(831) 454-3511

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)
INITIAL STUDY/ENVIRONMENTAL CHECKLIST

Date: September 25, 2017 **Application Number:** 161248-161253; 171059

Project Name: Davenport Gap **Staff Planner:** Jerry Busch

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: Crown Castle (Sharon James) **APN(s):** Public Rights-of-Way

OWNER: State of California (Caltrans); County of Santa Cruz **SUPERVISORAL DISTRICT:** District 2

PROJECT LOCATION: The proposed project involves seven wireless communication facilities (WCF), located in the locations described below. Stated distances are measured from center of intersection. (See Location Maps, Figures 1 and 2.) All locations are within unincorporated Santa Cruz County. Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

161248 (DAV 016): Highway 1 right of way, inland side, approximately 466 feet (0.1 mi.) south of the intersection with Swanton Road.

161249 (DAV 017): Cement Plant Road, southwest (coastal) side, approximately 90 feet south of the intersection with 1st Ave.

161250 (DAV 018): Highway 1 right of way, inland side, approximately 1,244 feet (0.24 mi.) south of the intersection with Davenport Ave. Meter site located in Old Coast Road right of way (County r.o.w.) approximately 102 feet northeast of the intersection with Highway 1.

161251 (DAV 019): Highway 1 right of way, inland side, approximately 1,147 feet (0.2 mi.) south of the intersection with Bonny Doon Road.

161252 (DAV 020): Highway 1 right of way, inland side, approximately 2,557 feet (0.5 mi.) north of the intersection with Laguna Road.

161253 (DAV 021): San Vicente Street in Davenport, northwest side, approximately 986 feet (0.19 mi.) north of the intersection with Marine View Ave.

171059 (DAV 022): Highway 1 right-of-way at the intersection with Marine View Ave., north side of intersection.

SUMMARY PROJECT DESCRIPTION:

Proposal to establish microcell antennas and equipment at seven sites, including six co-located sites and one new site. (See site locator maps, plans, and elevations, Attachment 8.) At two sites (DAV 018 and DAV 019), two co-located antennas would be mounted on utility poles and one equipment cabinet would be mounted on the ground at each site. At one site (DAV 016), two co-located antennas would be mounted on a utility pole, and one H-frame equipment structure would be mounted on the ground behind a wood screen. Two sites (DAV 017 & DAV 021) each would have two co-located, pole-mounted antennas and pole-mounted equipment. One site (DAV 020) would have two co-located, utility pole-mounted antennas and an equipment vault mounted underground. One site (DAV 022) is a new microcell site at which two antennas would be mounted on a new tower camouflaged as a utility pole, and one equipment cabinet would be mounted on the ground.

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.*

- [x] Aesthetics and Visual Resources
- [ ] Agriculture and Forestry Resources
- [ ] Air Quality
- [x] Biological Resources
- [x] Cultural Resources
- [ ] Geology and Soils
- [ ] Greenhouse Gas Emissions
- [ ] Hazards and Hazardous Materials
- [ ] Hydrology/Water Supply/Water Quality
- [ ] Land Use and Planning
- [ ] Mineral Resources
- [ ] Noise
- [ ] Population and Housing
- [ ] Public Services
- [ ] Recreation
- [ ] Transportation/Traffic
- [ ] Utilities and Service Systems
- [ ] Tribal Cultural Resources
- [ ] Mandatory Findings of Significance

DISCRETIONARY APPROVAL(S) BEING CONSIDERED:

- [ ] General Plan Amendment
- [ ] Land Division
- [ ] Rezoning
- [x] Development Permit
- [ ] Sewer Connection Permit
- [x] Coastal Development Permit
- [ ] Grading Permit
- [ ] Riparian Exception
- [ ] LAFCO Annexation
- [ ] Other:

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Encroachment permit, including Traffic Management Plan	Caltrans, County of Santa Cruz

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there would 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.

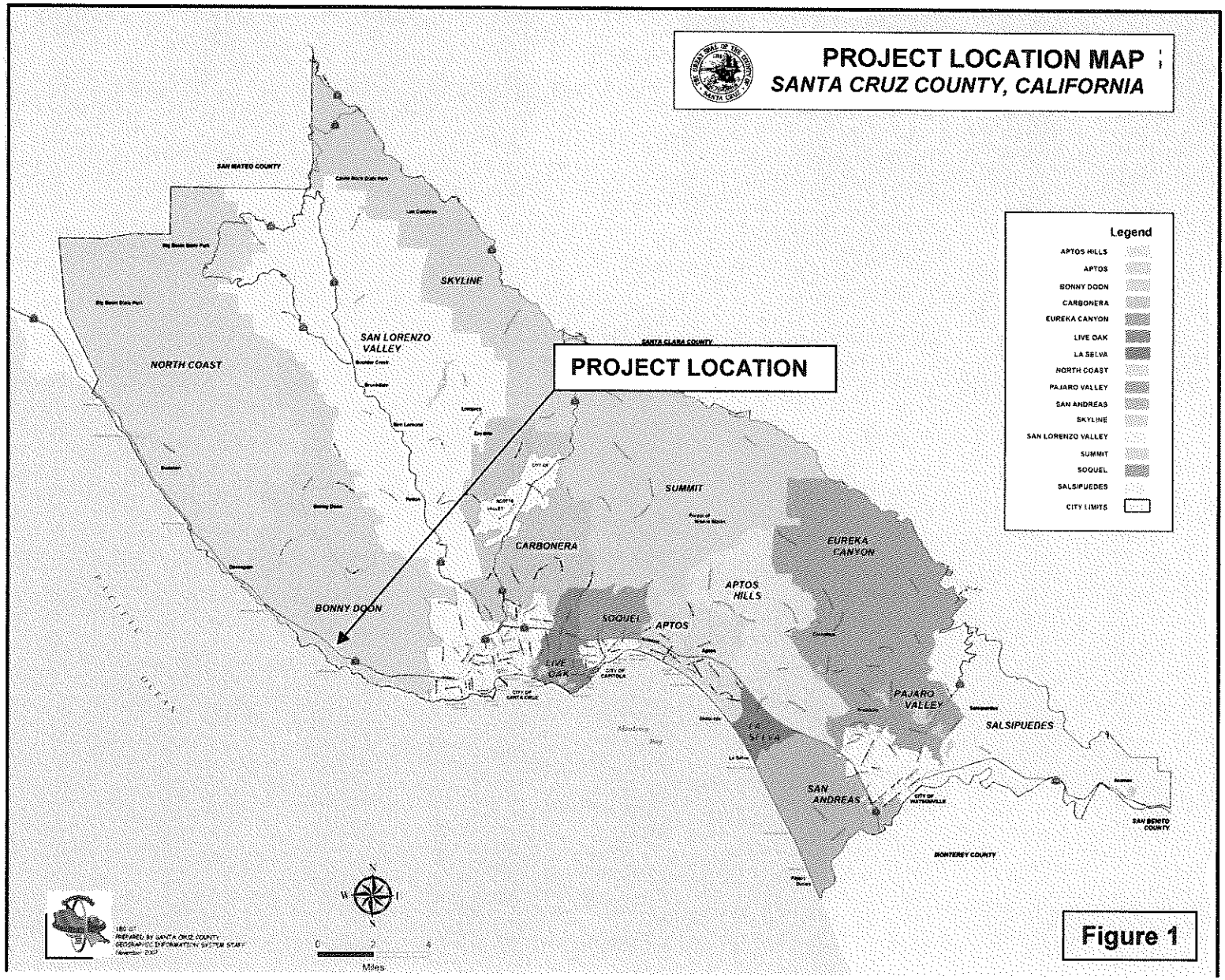
☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Todd Sexauer

TODD SEXAUER, Environmental Coordinator

9-29-17

Date


PROJECT LOCATION MAP
SANTA CRUZ COUNTY, CALIFORNIA
PROJECT LOCATION
Legend
APTOS HILLS
APTOS
BONNY DOON
CARBONERA
EUREKA CANYON
LIVE OAK
LA SELVA
NORTH COAST
PAJARO VALLEY
SAN ANDREAS
SKYLINE
SAN LORENZO VALLEY
SUMMIT
SOQUEL
SALSIPUEDES
CITY LIMITS
SAN MATEO COUNTY
SANTA CLARA COUNTY
SKYLINE
SAN LORENZO VALLEY
NORTH COAST
SUMMIT
CARBONERA
EUREKA CANYON
APTOS HILLS
BONNY DOON
SOQUEL
APTOS
LIVE OAK
PAJARO VALLEY
SALSIPUEDES
SAN ANDREAS
MONTEREY COUNTY
SAN BENITO COUNTY
Miles
Figure 1

PROJECT LOCATION MAP, DAVENPORT GAP WIRELESS PROJECT

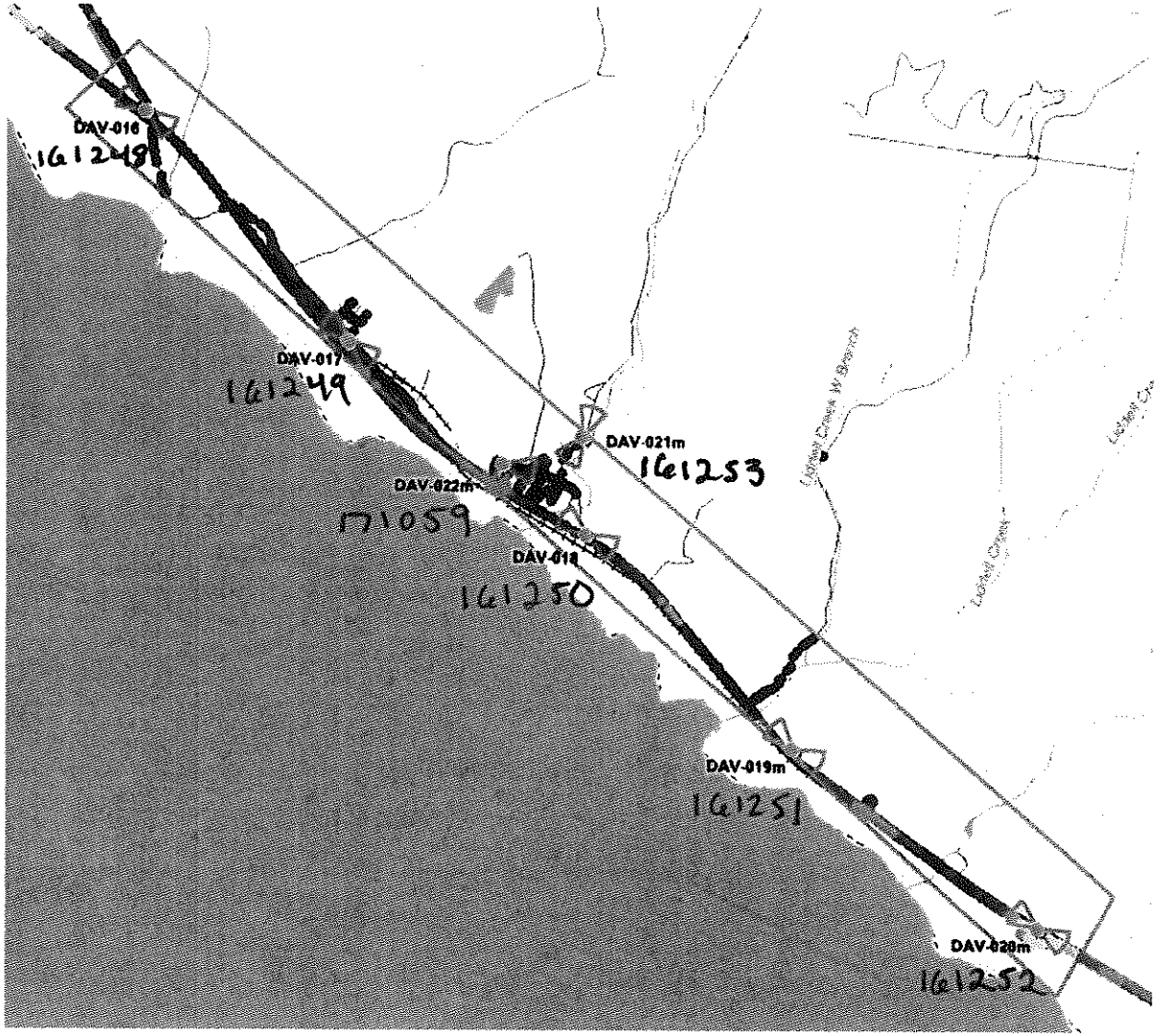


FIGURE 2

This page intentially left blank.

II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS:

Parcel Size:	Five sites in Caltrans right-of-way that is 100-380 feet wide Two sites in County rights-of-way that are 30 feet and 100 feet wide, respectively
Existing Land Use:	Six sites co-located on existing utility poles One site located on a new tower disguised as a utility pole
Vegetation:	General vegetation characteristics are as follows: 161248 (DAV 016): Primarily non-native, invasive roadside grasses and herbaceous plants mixed with scattered native shrubs and native, herbaceous plants. 161249 (DAV 017): Non-native roadside vegetation. 161250 (DAV 018): Native shrubs. Meter site: Primarily non-native roadside grasses and herbaceous plants mixed with scattered native shrubs and native, herbaceous plants. 161251 (DAV 019): Primarily native coastal scrub vegetation mixed with non-native grasses. 161252 (DAV 020): Non-native, invasive roadside grasses and herbaceous plants. 161253 (DAV 021): Pole and pole mounted equipment site on east side of road: willow tree, native vines; meter site on west side of road: non-native grasses. 171059 (DAV 022): Paved area with overhanging eucalyptus trees.

Slope in area affected by project: 0 - 30%

Nearby Watercourse:	Existing power pole at 161253 (DAV 021) is on road shoulder approximately 65 feet from San Vincente Creek.

ENVIRONMENTAL RESOURCES AND CONSTRAINTS:

Water Supply Watershed:	Not mapped	**Fault Zone:**	Not mapped
Groundwater Recharge:	Not mapped	**Scenic Corridor:**	Mapped
Timber or Mineral:	Not mapped	**Historic:**	No historic resources
Agricultural Resource:	Mapped	**Archaeology:**	Mapped
Biologically Sensitive Habitat:	Mapped	**Noise Constraint:**	Yes
Fire Hazard:	Mapped	**Electric Power Lines:**	No high-voltage lines
Floodplain:	Not mapped	**Solar Access:**	No solar access concern
Erosion:	Not mapped	**Solar Orientation:**	No solar

			orientation concern
Landslide:	Not mapped	**Hazardous Materials:**	No hazardous materials concerns
Liquefaction:	Not mapped	**Other:**	No other concerns

SERVICES:

Fire Protection:	Cal Fire	**Drainage District:**	Not in a drainage district
School District:	Pacific Elementary School District Santa Cruz High School District	**Project Access:**	No project access concerns
Sewage Disposal:	No sewage disposal requirements	**Water Supply:**	No ongoing water supply requirements

PLANNING POLICIES:

SITE	ZONING	GENERAL PLAN	Wireless	US L	COASTA L ZONE
161248 (DAV 016)	SU (Special Use)	A (Agriculture)	Restricted -Hwy 1	No	Yes
161249 (DAV 017)	PF (Public Facilities)	A (Agriculture)	Allowed	No	Yes
161250 (DAV 018)	CA (Commercial Agriculture)	A (Agriculture)	Restricted -Hwy 1	No	Yes
161251 (DAV 019)	CA (Commercial Agriculture)	A (Agriculture)	Restricted -Hwy 1	No	Yes
161252 (DAV 020)	SU (Special Use)	A (Agriculture)	Restricted -Hwy 1	No	Yes
161253 (DAV 021)	R-1-6 (Single-family residential, 6,000 sq.ft)	R-UL (Residential – Urban Low)	Prohibited	No	Yes
171059 (DAV 022)	SU (Special Use)	P (Public Facilities)	Restricted -Hwy 1	No	Yes

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

Natural Environment

Santa Cruz County is uniquely situated along the northern end of Monterey Bay approximately 55 miles south of the City of San Francisco along the Central Coast. The Pacific Ocean and Monterey Bay to the west and south, the mountains inland, and the prime agricultural lands along both the northern and southern coast of the county create

limitations on the style and amount of building that can take place. Simultaneously, these natural features create an environment that attracts both visitors and new residents every year. The natural landscape provides the basic features that set Santa Cruz apart from the surrounding counties and require specific accommodations to ensure building is done in a safe, responsible and environmentally respectful manner.

The California Coastal Zone affects land in the unincorporated County with special restrictions, regulations, and processing procedures required for development within the Coastal Zone area. Steep hillsides require extensive review and engineering to ensure that slopes remain stable, buildings are safe, and water quality is not impacted by increased erosion. The farmland in Santa Cruz County is among the best in the world, and the agriculture industry is a primary economic generator for the County. Preserving this industry in the face of population growth requires that soils best suited to commercial agriculture remain active in crop production rather than converting to other land uses.

PROJECT BACKGROUND:

The proposed Davenport Gap wireless project addresses a service gap created by decommission of the Wireless Communication Facility macro site located at the Lonestar Cement Plan, owned by Lonestar California, Inc. Crown Castle, the project applicant, stated that Lonestar denied a proposal submitted by Crown Castle to construct a replacement facility at the cement plant site. In order to address the service gap, Crown Castle is proposing microcell site at seven locations – five in the Highway One right of way and two in County of Santa Cruz rights of way.

DETAILED PROJECT DESCRIPTION:

Seven microcell sites are proposed, each with two antennas 2' tall, 16" wide and 7" deep, and each with ancillary equipment including meter, power supply and remote radio unit (RRU).

161248 (DAV 016): Proposal to remove an existing 30' tall wooden utility pole and install a wooden replacement pole 39' tall; co-locate two crossbar-mounted antennas and install ground equipment mounted on an H-frame surrounded by a rustic wooden fence screen and a native landscape.

161249 (DAV 017): Proposal to co-locate two crossbar-mounted antennas on an existing 50' tall utility pole, with two pole-mounted equipment boxes and a meter.

161250 (DAV 018): Proposal to co-locate two crossbar-mounted antennas on an existing 35' 5" utility pole and place an equipment cabinet on the ground. Meter would be located on an existing 38' 5" pole located at base of terrace. Meter top would be 9'9" off the ground.

161251 (DAV 019): Proposal to remove an existing 31'6" tall wooden utility pole and install a wooden replacement pole 44' tall; co-locate two crossbar-mounted antennas on the replacement pole and install an equipment cabinet on the ground.

161252 (DAV 020): Proposal to add a five-foot extension to an existing 23'7" utility pole, raising the pole height to approximately 28'7", co-locate two flush-mounted antennas at the top of the pole to a height of 32' (measured to top of antennas), and place equipment in an underground vault.

161253 (DAV 021): Proposal to add a five-foot extension to an existing 25'7" utility pole, raising the pole height to approximately 30'7", co-locate two flush-mounted antennas at the top of the pole to a height of 34' (measured to top of antennas), mount two equipment boxes on the same utility pole, and mount a meter beneath a disconnect switch on an existing utility pole across the street. Top of disconnect switch would be 11'3" off the ground.

171059 (DAV 022): Proposal to establish a new located microcell site consisting of an installed 43' tall utility pole (height requested by County staff in order to place antenna within tree canopy) with two flush-mounted antennas, and an equipment cabinet on the mounted on the ground and camouflaged with locally commissioned artwork (artwork not shown).

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

III. ENVIRONMENTAL REVIEW CHECKLIST

A. AESTHETICS AND VISUAL RESOURCES

Would the project:

1.	*Have a substantial adverse effect on a scenic vista?*	☐	☐	☒	☐

***Discussion*:**

Santa Cruz County General Plan.

The County General Plan designates Highway 1 as scenic highway and its viewsheds as scenic resources. The General Plan's visual resource policies provide for the protection and management of scenic resources and the mitigation of potential adverse impacts. The primary General Plan visual resource policies relevant to the proposed Davenport Gap Wireless project are policies 5.10.11 and 5.10.13, which establish the following requirements:

> Require the siting, architectural design and landscaping to avoid or mitigate impacts on scenic roads and resources (5.10.11).
>
> Blend grading with natural terrain and incorporate indigenous plant species (5.10.13).

Santa Cruz County Code.

Following is a discussion, summary and excerpts from relevant code sections:

Section 13.10.661 prohibits wireless communication facilities (WCF) in two zoning districts covering parts of the project area -- Single-Family Residential (R-1) and Commercial Agriculture (CA) districts -- unless a Telecommunications Act Exception is approved pursuant to SCCC 13.10.668.

Section 13.10.661(4) provides that:

> "If a Telecommunications Act exception is approved pursuant for siting a wireless communications facility within any of the above-listed prohibited areas, then such facility shall comply with the remainder of SCCC 13.10.660 through 13.10.668, inclusive, and shall be co-located. Applicants proposing new wireless communication facilities in any of the above-listed prohibited areas must submit as part of their application an alternatives analysis, as described in SCCC 13.10.662(C). Non-co-located wireless communication facilities may be sited in the prohibited areas listed above only in situations where the applicant can prove that:
>
> (a) The proposed wireless communication facility would eliminate or substantially reduce one or more significant gaps in the applicant carrier's network; and
>
> (b) There are no viable, technically feasible, and environmentally (e.g., visually)

equivalent or superior potential alternatives (i.e., sites and/or facility types and/or designs) outside the prohibited areas identified in subsection (B) of this section that could eliminate or substantially reduce said significant gap(s).

Any wireless communications facility and any associated development allowed in a prohibited area: (i) shall be sited and designed so that it is not visible from public vantage points to the maximum extent feasible; or (ii) where some portion or all of such a facility and/or any associated development is unavoidably sited and/or designed in a manner that makes it visible from public vantage points (and cannot be sited and/or designed to not be visible), that portion shall be screened and/or camouflaged so that it is inconspicuous and designed to blend seamlessly into the existing public view.

Section 13.10.661(C) establishes restricted areas for wireless facilities and includes among these the right-of-way of the first through public road parallel to the sea, subject to exceptions provided by 13.10.661(C)(3). If a wireless communications facility is allowed within this right-of-way, it is required to be a microcell site located on the inland side of the right-of-way, and meet the following criteria:

- *Shall be mounted upon an existing or replacement utility pole (where "replacement" means that there exists a utility pole in that location and it is immediately replaced with a pole that has the same or a reduced visual impact, and has the same or lesser dimensions as the existing utility pole); and*
- *Shall have antennas no larger than one foot by two feet that are flush mounted and of a color that blends with that of the supporting utility pole; and*
- *Shall have an equipment cabinet that is no more than 24 inches high, 18 inches wide, and 10 inches deep if mounted upon the utility pole or on the ground, or is located in an underground vault; and*
- *Shall be fully camouflaged through stealth techniques to render the facility as visually inconspicuous as possible; and*
- *Shall be removed and the site restored by the applicant if informed by the owner and operator that the utility pole is to be removed because the utilities the pole supports are to be relocated underground.*

Section 13.10.661(3) provides that WCFs that are co-located upon existing wireless communication facilities/towers or other utility towers/poles (e.g., PG&E poles), and which do not significantly increase the visual impact of the existing facility/tower/pole, are allowed in the restricted right-of-way. Applicants proposing new non-co-located wireless communication facilities in the restricted areas must submit as part of their application an alternatives analysis, and prove that proposed WCF would eliminate or significant gaps in the network and that there are no viable, technically feasible, and environmentally (e.g., visually) equivalent or superior potential sites and/or facility designs outside the prohibited

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

and restricted areas that could eliminate or substantially reduce said significant gap(s).

Section 13.10.663(A) provides general development/performance standards for wireless communication facilities, including the elements summarized below:

Site location and development of wireless communications facilities shall preserve the visual character, native vegetation and aesthetic values of the parcel on which such facilities are proposed, the surrounding parcels and road rights-of-way, and the surrounding land uses to the greatest extent that is technically feasible, and shall minimize visual impacts on surrounding land and land uses to the greatest extent feasible. Facilities shall be integrated to the maximum extent feasible to the existing characteristics of the site, and every effort shall be made to avoid, or minimize to the maximum extent feasible, visibility of a wireless communication facility within significant public viewsheds. Utilization of camouflaging and/or stealth techniques shall be encouraged where appropriate. Support facilities shall be integrated to the existing characteristics of the site, so as to minimize visual impact.

Wireless communication facilities proposed for visually prominent hillside locations shall be sited and designed to be as visually unobtrusive as possible. Consistent with General Plan/LCP Policy 8.6.6, wireless communication facilities should be sited so the top of the proposed tower/facility is below any ridgeline when viewed from public roads in the vicinity. If the tower must extend above a ridgeline the applicant must camouflage the tower by utilizing stealth techniques and hiding it among surrounding vegetation.

Disturbance of existing topography and on-site vegetation shall be minimized, unless such disturbance would substantially reduce the visual impacts of the facility.

To minimize visual impacts to surrounding residential uses and public primary or secondary schools, the base of any new freestanding telecommunications tower or building/roof-mounted wireless communication facility shall be set back from the property line of any residentially zoned parcel, or the property line for any public primary or secondary school, a distance equal to five times the height of the tower if mounted upon a telecommunications tower, or a minimum of 300 feet, whichever is greater. This requirement may be waived by the decision-making body if the applicant can prove that the wireless communication facility would be camouflaged or otherwise made inconspicuous such that visual impacts are not created, or if the applicant can prove that a significant area proposed to be served would otherwise not be provided personal wireless services by the subject carrier, including proving that there are no viable, technically feasible, environmentally equivalent or superior alternative sites.

Aesthetics, visual analysis and site alternatives.

As cited above, County Code §13.10.663(A)(9) requires that a new, non-co-located cell site less than 300 feet to a school or residentially zoned parcel shall 1) be camouflaged or inconspicuous such that visual impacts are not created, or 2) provide an alternatives analysis, to prove that "there are no viable, technically feasible, environmentally equivalent or superior alternative sites outside the prohibited and restricted areas." Application 171059 (DAV 022) is located approximately 50 feet from a residentially zoned parcel and approximately 265 feet from the property line of a public school. The proposed antenna would be within the crown of an existing eucalyptus tree and within a eucalyptus grove, camouflaged by the surrounding tree branches and foliage; the ground-mounted cabinet would be provided with a mural that would become a visual asset, so that no visual impacts are created. However, an alternatives analysis was also prepared for this site to demonstrate that no viable, technically feasible, environmentally equivalent or superior alternative sites exist outside the prohibited and restricted areas.

Five of the seven proposed cell sites are adjacent to Highway One in the Caltrans right-of-way. Four sites do not comply with the design criteria provided by SCCC §13.10.661(C)(2), and would require a Telecommunications Act Exception pursuant to 13.10.668, as follows:

- At two sites, the co-located microcell sites entail replacement poles that exceed the existing poles in height, thereby not complying with SCCC §13.10.661(C)(2)(a)(i), which limits the replacement pole to "the same or lesser dimensions as the existing utility pole." See additional discussion in section D-5.
- At the five sites where equipment cabinets are proposed on the ground or in a vault, the equipment cabinet is greater than 21" tall, 18" wide and 10" deep, the dimensions provided by SCCC §13.10.661(C)(2)(a)(iii) for pole mounted equipment. It is not the intention of the ordinance to apply those dimensions to ground mounted equipment. However, the code section could be interpreted to apply to ground mounted equipment, so the ground-mounted cabinets would be included in the Telecommunications Act Exception. In all cases, as described below, the ground mounted cabinets, ground-mounted H-frame structure and the ground-mounted vault would be camouflaged, screened or hidden to avoid potential visual impacts.
- In four of the seven sites, the antenna would be crossbar-mounted rather than flush mounted, hence not compliant with SCCC §13.10.661(C)(2)(a)(ii), which requires flush mounting. The crossbar mounting is required to comply with regulatory climbing space requirements pursuant to California Public Utilities Commission General Order 95, Section VIII - Detailed Construction Requirements for

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

Communication Lines, Sect. 94.1: "Antennas shall maintain a 2 ft. horizontal clearance from centerline of the pole when affixed between supply and communication lines or below communication lines." A Telecommunications Act Exception would be necessary to provide compliance with CPUC GO95.

A Telecommunications Act Exception requires an evaluation of alternatives to demonstrate "that no alternatives exist which would render the approval of a Telecommunications Act exception unnecessary, and that "there are no viable, technically feasible, and environmentally (e.g., visually) equivalent or superior potential alternatives ...." (13.10.661(4)(b)).

Justification for increased pole heights was provided by the applicant in support of a Telecommunications Act Exception, as follows:

161248 (DAV 016): Due to the terrain, the top of the antennas need to be at 27'-6" to see over the hill to the north to provide coverage up Hwy 1. At that height they would be too close to the power conductors which are currently at 29'-1". To achieve the minimum GO95 (see A-1 above) clearance of 6' from power, which in this case would be a new transformer, the pole needs to be replaced with a 45' long pole which would be set into the ground 6' resulting in the top of pole being at 39'. Utility poles come in standard lengths starting at 20' at 5' increments. The depth of embedment increases as the poles get longer.

161250 (DAV 018): *Ibid.* Pole height required by GO95 clearance requirements.

161252 (DAV 020): Crown engineers want the antennas high enough to achieve good line-of-sight for the intended coverage area, but conversely, if they are too high, then they "see" too far and overlap with other cells and cause interference.

161253 (DAV 021): At DAV 021m the top of the existing pole is surrounded by many branches. The antennas are required to be above the branches to prevent signal blockage. The increase in height was minimized by using the shortest allowed extension. (Staff note: willow branches may increase in height over time to improve visual screening, subject to any pruning required to prevent blockage.)

To summarize the foregoing, an alternatives analyses is required (and was prepared), for all seven proposed sites (see Attachment 4, Project Site Alternatives), based on these factors:

161248 (DAV 016): Replacement pole exceeds existing pole in height; antenna crossbar mounted, ground-mounted equipment framework exceeds dimensions associated in code. Requires a Telecommunications Act Exception.

161249 (DAV 017): Antenna crossbar mounted. Requires a Telecommunications Act Exception. (Note: Co-located sites not subject to SCCC §13.10.663(A)(9).)

161250 (DAV 018): Antenna crossbar mounted, ground mounted equipment cabinet exceeds dimensions associated in code. Requires a Telecommunications Act Exception.

161251 (DAV 019): Replacement pole exceeds existing pole in height; antenna crossbar mounted, equipment cabinet exceeds dimensions associated in code. Requires a Telecommunications Act Exception.

161252 (DAV 020): Underground vault exceeds dimensions associated in code. Included in Telecommunications Act Exception.

161253 (DAV 021): Prohibited district; pole height increased. Requires a Telecommunications Act Exception.

171059 (DAV 022): New site, not co-located, proximal to school and residential neighborhood. Requires a Telecommunications Act Exception.

Visual Analysis

The proposed project sites located along Highway One are described below, along with their potential visual effects and mitigation measures. Visual Simulations of Preferred Sites are provided in Attachment 3. The alternatives analysis provided in Attachment 4 includes a comparison of visual alternatives.

The Davenport Gap project addresses a significant gap in service that resulted from the decommissioning of a macro site at the Lonestar cement plant (700 Cement Plant Road). (See Attachment 2) The first alternative examined by the applicant, Crown Castle, was replacement of the macro site at the cement plant. This proposal was rejected by Lonestar for any potential site on the Lonestar property.

161248 (DAV 016) is located in a scenic viewshed adjacent to Highway 1. The site is on a low, south-facing slope on the inland side of the highway. The antennas would be visible from both the northbound and southbound lanes. The cabinet fence would be visible from the northbound lanes but only momentarily visible from the southbound lanes.

The proposed micocell site would be co-located at an existing utility site. The project would remove an existing 30' tall power pole and replace it with a new pole that is 39 feet tall. According to the applicant, the 9-foot extra height would eliminate the need for another cellular facility in the area. The antenna are crossbar-mounted to comply with regulatory climbing space requirements pursuant to California Public Utilities Commission General Order 95, Section VIII - Detailed Construction Requirements for Communication Lines, Sect. 94.1: "Antennas shall maintain a 2 ft. horizontal clearance from centerline of the pole when affixed between supply and communication lines or below communication lines." A proposed H-frame equipment structure would be placed adjacent to the pole and screened

with a rustic picket fence and a native landscape plan.

Because the addition of any height to a replacement power pole within the Highway 1 right-of-way does not comply with Santa Cruz County Code Section 13.10.661(C)(a)(i), the crossbar mount does not comply with the flush-mount requirement of 13.10.661(C)(a)(ii), and the equipment H-frame structure does not conform with the associated (primarily for pole-mounted equipment) dimensions in 13.10.661(C)(a)(iii), a Telecommunications Act exception would be required to establish the higher pole in this location and to allow the crossbar in lieu of flush-mounted antennas. (See also Section D-5 below.)

As required for a Telecommunications Act exception, alternative sites were considered for this location (see Attachment 4). Four alternative sites were evaluated north of the intersection of Swanton Road and Highway 1 (Appendix 1). These alternative sites were rejected for the following reasons:

Alternative 1: Existing pole has two transformers. Stand-off antennas would not be allowed due climbing space restrictions provided by CPUC GO95. Site is in a prohibited district (CA – commercial agriculture).

Alternative 2: Existing pole did not link with existing network and had structural issues. Prohibited district (CA – commercial agriculture).

Alternative 3: Scenic location within prohibited district (CA Commercial Agriculture).

Alternative 4: Location had access issues, would require new pole, and not preferred due to scenic concerns at Swanton Road intersection with Highway 1.

An additional alternative site was subsequently considered in the Highway 1 right-of-way (Appendix 2). Site alternative 5 is an existing power pole right at the intersection of Swanton Road and Highway 1. This site was initially submitted by the applicant as the preferred alternative, with meter and equipment pole-mounted to avoid potential impacts to red-legged frog, a protected species. This site was not preferred by County staff because Swanton Road is a designated scenic road, and the intersection with Highway provides a prominent gateway to the Swanton Road area. Establishment of a microcell site at this intersection would be significantly more visually intrusive than the proposed site. Additional issues with site alternative 5 are discussed in Section D(1), pertaining to red-legged frog avoidance and mitigation.

The preferred site (Attachment 3) is located approximately 445 feet south of the intersection of Highway 1 and Swanton Road. At this site, the proposed co-located antenna and the 39' tall proposed replacement pole would not have a substantial, adverse, intrusive, visual effect on the environment, as the pole is located away from the intersection with Swanton Road. The antennas placed on a utility pole at the preferred site would be tinted brown to present an overall appearance similar to existing poles with attached power and

communication lines elsewhere within the Highway 1 right-of-way along the North Coast.

The placement on the ground of an equipment cabinet or H-frame for wireless equipment could have a potentially adverse visual effect if not camouflaged. However, the equipment cabinet is proposed be enclosed in a rustic, unfinished fence typical of rural enclosures for pump facilities, irrigation / equipment storage and other rural enclosures. The fence would be rustically landscaped with vegetation indigenous to the site. The camouflage elements of a rustic, wooden screen and natural vegetation for the equipment and antennas co-located on a power pole would avoid a significant visual intrusion by the proposed microcell site.

The visual simulations at this site (Attachment 4) include a visual simulation of pole-mounted equipment for visual comparison purposes. Pole-mounted equipment would reduce the extent of required biotic mitigation measures associated with ground-mounted equipment, but is generally considered to be more visually intrusive.

161249 (DAV 017) is a proposed co-located, pole-mounted microcell site located in the Cement Plant Road right-of-way, on the southwest (coastal) side, approximately 90 feet south of the intersection with 1st Ave. (Attachment 4). Two antenna would be mounted on cross-arms, with a meter and equipment shroud pole-mounted below. This is not a designated scenic road, and the south side of the right-of-way is already used for a variety of equipment purposes, including existing utility poles, a railway crossing and other equipment. The proposed antenna and pole-mounted equipment are 150 feet from the Highway 1, a designated scenic highway, but not visually intrusive. The view from Highway 1 southbound is partially obscured by existing vegetation. The site is visible to primarily one residence on 1st Ave. To avoid adverse effects on neighborhood character, the equipment would be mounted on the Highway 1 side to minimize visibility to the nearby neighborhood and painted with colors mixed on-site to match the utility pole. With the mitigations, the impact would be less-than-significant.

161250 (DAV 018) is a proposed co-located microcell site located on the inland side of the Highway 1 right-of-way on an elevated marine terrace deposit above a road cut (Attachment 4). The proposed antenna would be crossbar-mounted to comply with regulatory climbing space requirements pursuant to California Public Utilities Commission General Order 95. The antennas would be visible for a short distance from the northbound lane and for a larger distance from the southbound lane. The antennas would be painted brown to match the pole and to resemble pole-mounted wires and other utility equipment existing in the right-of-way. A ground-mounted equipment cabinet would be placed northeast of the pole, wholly screened from Highway 1 by existing native shrub vegetation, and largely screened from the community of Davenport, which is approximately 0.25 miles to the northwest. The top of the cabinet may be visible from certain locations in Davenport. To mitigate the visual effect and render the cabinet difficult to see from every angle, the cabinet skin would be covered with a photomural or painted a color that blends

in with surrounding vegetation. The two small antenna would not be conspicuous; the equipment cabinet would be not be visible from Highway 1 and would be largely screened by vegetation from the town of Davenport; the cabinet skin would blend with the natural surroundings. Visual impacts would be less than significant.

161251 (DAV 019) is a proposed microcell site very similar to DAV 019. The site is located on the inland side of the Highway 1 right-of-way on an elevated marine terrace deposit above a road cut (Attachment 4). The proposed antenna would be 2' tall and 16" wide, crossbar-mounted to comply with regulatory climbing space requirements pursuant to California Public Utilities Commission General Order 95. The antennas would be co-located on a replacement pole, visible for a short distance from the northbound lane and for a larger distance from the southbound lane. The antennas would be painted brown to match the pole. A ground-mounted equipment cabinet would be placed east of the pole, set back from the terrace slope break and wholly screened from Highway 1 by the road cut and the angle of the hillslope. To mitigate the visual effect and render the cabinet difficult to see from every angle, the cabinet would be painted a color that blends in with surrounding vegetation and screened with native vegetation. The two small antenna would not be conspicuous; the equipment cabinet would be visible only from above and would blend with its surroundings. Visual impacts with mitigation would be less than significant.

161252 (DAV 020) is a proposed co-located microcell site located on the inland side of the Highway 1 right-of-way between the edge of pavement and an agricultural field (Attachment 4), across the highway from farm houses. Power would be brought from the coastal side of the highway. The two antenna would be 2' tall and 16" wide, flush-mounted. A 5-foot extension would be added to the pole, raising the height from 23'7" tall to 28'7" tall. The meter would be pole mounted. The rest of the equipment would be placed in a vault underground, protected by four bollards painted safety-yellow. The vegetation at this site is dominated by wild radish and grasses, which would provide a visual screen for the vault and most of the bollards that would render these minimally visible during most of the year. To avoid adverse visual effects and render the cabinet difficult to see from every angle, the cabinet exterior would be covered with a photomural of site vegetation or painted in colors mixed on site to match background vegetation in summer condition, when the vegetation colors are primarily brown and yellow. The two small antenna would not be conspicuous; the equipment vault would be out of sight, and the bollards would be hidden by vegetation during most of the year. Visual impacts would be less than significant.

A visual simulation of pole mounted equipment at this site is include in the visual simulations (Attachment 3), for comparison purposes. Pole-mounted equipment would slightly reduce the extent of required biotic mitigation measures associated with ground-mounted equipment, but is generally considered to be a greater visual impact.

161253 (DAV 021) is a proposed co-located microcell site located adjacent to San Vicente

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

Road north of Davenport (Attachment 4). San Vicente Road is not a designated scenic road; though in a mapped scenic resource area, the proposed microcell site is not visible from Highway 1. The proposed site is adjacent to a residential neighborhood to the west and to San Vicente Creek to the east. The meter would be mounted on an existing power pole on the west side of the street. The two proposed antenna are 2' tall and 16" wide, flush-mounted on an existing utility pole on the east side of the street. A 5' foot extension would be added to the pole, raising the height from 25'7" tall to 30'7" tall. The microcell equipment would be pole mounted within a shroud below the antenna. The equipment shroud would be placed within the canopy of an existing willow tree, and the antennas would be placed just above the top of the crown. The antenna would be painted the color of willow leaves, and the shrouds would be painted the color of willow bark or leaves. The equipment location within the tree canopy and antenna location near the top of the crown would render the microcell site well-camouflaged and inconspicuous. Visual impacts would be less than significant.

171059 (DAV 022) is a proposed new microcell site located on the inland side of the Highway 1 right-of-way at the north corner of the intersection with Marine View Avenue (Attachment 4). The proposed antenna would be 2' tall and 16" wide, flush mounted to a wood utility pole. The antennas would be within the canopy of an existing eucalyptus tree at the site and would be painted eucalyptus green with colors mixed onsite. A ground-mounted equipment cabinet would be placed north of the existing bus shelter at an adjacent Santa Cruz Metro stop. The cabinet skin would be a painted mural produced by a local artist. The two small antenna would be hidden in the tree canopy, and the equipment cabinet would provide a visual amenity for the town of Davenport. Visual impacts would be less than significant.

2.	*Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*	☐	☐	☒	☐

Discussion: The project site is located along a County designated scenic road (Highway 1), within a designated scenic resource area, and a state scenic highway. The proposed project would not affect the visual quality of any trees, rock outcroppings, historic buildings or other special resources. Therefore, no impact is anticipated.

3.	*Substantially degrade the existing visual character or quality of the site and its surroundings?*	☐	☐	☒	☐

Discussion: As discussed in Section III.A.1 above, the visual setting for five of the project sites is the right-of-way of Highway 1, a designated scenic highway. One site is in a County right-of-way adjacent to and visible from Highway One, and one site is in a County right-

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

of-way not visible from Highway 1. The proposed project is designed and landscaped so as to fit into this setting. Four pairs of antennas adjacent to the Highway 1 right-of-way would be visible from the highway but would be co-located and designed to resemble standard utility equipment located throughout the right-of-way. One pair of antenna would be hidden in a eucalyptus canopy, and one would be co-located on a utility pole along Cement Plant Road at a site that is not visually intrusive to the scenic vista of Highway 1.

All of the proposed equipment shelters associated with the project are sited and designed to be hidden from view or to blend in with natural surroundings. Ground-mounted shelters are proposed at five sites; of these, one is underground, one is screened by a fence and a native landscape, one is hidden by topography, one is hidden by indigenous shrubs and topography and one supports an artistic mural that provides a visual amenity. Of the two pole-mounted shelters, one is distant from Highway One among other utility structures along Cement Plan Road, and one is within the canopy of a willow tree. Therefore, impacts would be less than significant.

4.	*Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*	☐	☐	☐	☒

Discussion: The project would create no night lighting. No impact would occur.

B. AGRICULTURE AND FORESTRY RESOURCES

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

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?*	☐	☐	☐	☒

Discussion: The project sites, located entirely within public rights of way, do not contain any lands meeting the definition of Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and

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

Monitoring Program of the California Resources Agency. In addition, the project does not contain Farmland of Local Importance. Though mapped as Type 3 Agricultural Resource Land, defined as "Viable Agricultural Land Within the Coastal Zone," lands within the Caltrans right-of-way are not considered viable, due to fragmented locations, access and drainage issues and proximity to Highway 1. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Farmland of Local Importance would be converted to a non-agricultural use. No impact would occur from project implementation.

2.	*Conflict with existing zoning for agricultural use, or a Williamson Act contract?*	☐	☐	☐	☒

Discussion: None of the project sites are subject to a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract. No impact is anticipated.

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

Discussion: The project is not located near land designated as Timber Resource. Therefore, the project would not affect the resource or access to harvest the resource in the future.

4.	*Result in the loss of forest land or conversion of forest land to non-forest use?*	☐	☐	☐	☒

Discussion: No forest land occurs on the project site or in the immediate vicinity. See discussion under B-3 above. No impact is anticipated.

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?*	☐	☐	☐	☒

Discussion: The co-located antenna and replacement poles would be among many such installations along the Highway 1 right-of-way which have no effect on adjoining agricultural lands. The equipment cabinets and one vault installed on the ground would

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

rely on natural vegetation for camouflage. Therefore, no impacts are anticipated.

C. AIR QUALITY

The significance criteria established by the Monterey Bay Unified Air Pollution Control District (MBUAPCD) has been relied upon to make the following determinations. Would the project:

1. *Conflict with or obstruct implementation of the applicable air quality plan?*	☐	☐	☒	☐

Discussion: The project would entail no long-term emissions and those associated with construction would be extremely minor, involving only minor trenching and excavation. The project would not conflict with or obstruct any long-range air quality plans of the Monterey Bay Unified Air Pollution Control District (MBUAPCD). Because general construction activity related emissions (i.e., temporary sources) are accounted for in the emission inventories included in the plans, impacts to air quality plan objectives are less than significant. See C-2 below.

2. *Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*	☐	☐	☒	☐

Discussion: Minor trenching and excavation would occur in thin soils and mudstone that characterizes 5 of the 7 sites; at two remaining sites, very minor trenching in soils that are frequently moist would occur, so that the level of dust created would be negligible. The excavated material would be recompacted into holes and trenches; and remaining small quantities of spoils would be off-hauled to the appropriate landfill. The overall quantity to be hauled would be less than 100 cubic yards, so the associated diesel emissions associated with hauling would be negligible.

Santa Cruz County is located within the North Central Coast Air Basin (NCCAB). The NCCAB does not meet state standards for ozone (reactive organic gases [ROGs] and nitrogen oxides [NOx]) and fine particulate matter (PM_{10}). Therefore, the regional pollutants of concern that would be emitted by the project are ozone precursors and PM_{10}.

Ozone is the main pollutant of concern for the NCCAB. The primary sources of ROG within the air basin are on- and off-road motor vehicles, petroleum production and marketing, solvent evaporation, and prescribed burning. The primary sources of NOx are on- and off-road motor vehicles, stationary source fuel combustion, and industrial processes. In 2010, daily emissions of ROGs were estimated at 63 tons per day. Of this, area-wide sources represented 49 percent, mobile sources represented 36 percent, and stationary sources represented 15 percent. Daily emissions of NOx were estimated at 54 tons per day with 69 percent from mobile sources, 22 percent from stationary sources, and 9 percent from area-wide sources. In addition, the region is "NOx sensitive," meaning that ozone

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

formation due to local emissions is more limited by the availability of NOx as opposed to the availability of ROGs (MBUAPCD, 2013b).

PM_{10} is the other major pollutant of concern for the NCCAB. In the NCCAB, highest particulate levels and most frequent violations occur in the coastal corridor. In this area, fugitive dust from various geological and man-made sources combines to exceed the standard. Nearly three quarters of all NCCAB exceedances occur at these coastal sites where sea salt is often the main factor causing exceedance (MBUAPCD, 2005). In 2005 daily emissions of PM_{10} were estimated at 102 tons per day. Of this, entrained road dust represented 35 percent of all PM_{10} emission, windblown dust 20 percent, agricultural tilling operations 15 percent, waste burning 17 percent, construction 4 percent, and mobile sources, industrial processes, and other sources made up 9 percent (MBUAPCD, 2008).

The project would generate no new long term traffic, and would produce negligible impacts from truck and equipment emissions, so no new emissions of ROGs or NOx would exceed MBUAPCD thresholds for these pollutants. Therefore, there would not be a significant contribution to an existing air quality violation.

Project construction may result in a short term, very minimal decrease in air quality only slightly wider than the construction zone due to generation of PM_{10}. However, standard dust control best management practices, such as periodic watering, would be implemented during construction to avoid significant air quality impacts from the generation of PM_{10}.

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)?* ☐ ☐ ☒ ☐

Discussion: Project construction would have a very limited and temporary potential to contribute to existing violations of California air quality standards for ozone and PM_{10} primarily through diesel engine exhaust and fugitive dust. However, the Santa Cruz monitoring station has not had any recent violations of federal or state air quality standards mainly through dispersion of construction-related emission sources. The proposed project would not result in a cumulatively considerable net increase in criteria pollutants. The impact on ambient air quality would be less than significant.

4. *Expose sensitive receptors to substantial pollutant concentrations?* ☐ ☐ ☒ ☐

Discussion: The proposed wireless project would not generate substantial pollutant concentrations. Emissions from construction activities represent temporary impacts that are

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

typically short in duration. Impacts to sensitive receptors would be less than significant.

5. *Create objectionable odors affecting a substantial number of people?*	☐	☐	☒	☐

Discussion: California ultralow sulfur diesel fuel with a maximum sulfur content of 15 ppm by weight would be used in all diesel-powered equipment, which minimizes emissions of sulfurous gases (sulfur dioxide, hydrogen sulfide, carbon disulfide, and carbonyl sulfide). Therefore, no objectionable odors are anticipated from construction activities associated with the proposed project, and no mitigation measures would be required. The proposed project would not create objectionable odors affecting a substantial number of people; therefore, impacts are expected to be less than significant.

D. 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 Wildlife, or U.S. Fish and Wildlife Service?*	☐	☒	☐	☐

Discussion: A Biotic Report was prepared for this project, covering all seven proposed microcell sites, by Synthesis Planning (Cord Hute), dated August 2017. This report has been reviewed and accepted by the Planning Department Environmental Section (Attachment 5). The Biotic Report entailed site surveys for special status wildlife, plants and plant communities at all the subject sites and a literature search. On-site and buffer area habitats were evaluated for suitability for California red-legged frog (CRF) as well as for other special-status wildlife species and plant species during these surveys. Buffer area is 500 foot radius from center of project site. Analysis of aerial photographs was conducted of adjacent habitat that could provide terrestrial habitat for CRF, and ponds and water bodies that could provide potential breeding habitat for CRF but from which have not been reported in the CNDDB. Habitats within 1.0 mile were evaluated for their potential to provide connectivity between sites for CRF.

Special status wildlife species occurring within project sites, buffer area or project vicinity.

California red-legged frog (CRF) was identified as potentially occurring on the project site. CRF is Federally listed as Threatened, and is a California Species of Special Concern. The project area is located within the Santa Cruz 1 Critical Habitat Unit for California red-legged frog located in the northwest corner of Santa Cruz County (USFWS 2010).

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

Potential upland aestivation and dispersal habitat near potential breeding areas is present in the DAV 016m3 and DAV 019m project sites and buffer areas. No breeding habitat for this species was observed within any of the proposed project sites. No sign of this species was observed during biological surveys. This species has been documented approximately 0.1 miles northwest of the DAV 016m3 project site, and within the immediate vicinity of the DAV-018 and DAV 019m3 project sites (CDFW 2017). Recent information indicates presence of the species in the close vicinity of DAV 017 (Matt Johnston, County staff, pers. comm.)

During dry periods, California red-legged frogs are seldom found far from water. However, during wet weather, individuals may make overland excursions through upland habitats over distances up to 2 miles. These dispersal movements are generally straight-line, point-to-point migrations rather than following specific habitat corridors. Dispersal distances are believed to depend on the availability of suitable habitat and prevailing environmental conditions. Very little is known about how California red-legged frogs use upland habitats during these periods.

During summer, California red-legged frogs often disperse from their breeding habitat to forage and seek summer habitat if water is not available (USFWS 2017). This habitat may include shelter under boulders, rocks, logs, industrial debris, agricultural drains, watering troughs, abandoned sheds, or hay-ricks. They will also use small mammal burrows, incised streamed channels, or areas with moist leaf litter (Jennings and Hayes 1994). This summer movement behavior, however, has not been observed in all California red-legged frog populations studied.

In addition to the California red-legged frog (CRF), eleven additional special status species have been identified as potentially occurring on the subject property, of which six are bird species and five are bat species. None of these were observed during site surveys.

The six potentially occurring bird species are Cooper's hawk, Western burrowing owl, California yellow warbler, white-tailed kite, Pacific-slope flycatcher and loggerhead shrike. All of these species are California Species of Special Concern except for the white-tailed kite, which is a California Fully Protected species. Potential nesting and foraging habitat for these six species was observed within the project area, buffer area or vicinity of the project site (see Table 2 and species discussion in biotic report). None of the six species been documented within the boundaries of or in proximity to the proposed project site (CDFW 2017).

The five potentially occurring bat species are: Pallid bat, hoary bat, fringed myotis, Western red bat, and Townsend's big-eared bat. Each of these species may forage intermittently within any of the project sites and buffer areas. Potential roosting habitat was observed for the hoary bat and Western red bat within the DAV 021m project site buffer area. None of

the bat species has been documented within the immediate vicinity of proposed project site (CDFW 2017).

Special status plant species occurring within project sites, buffer area or project vicinity.

No special status plant species were observed or expected to occur on any project site.

Potential Adverse Impacts to Potentially Occurring Wildlife Species

California red-legged frog (CRF):

Implementation of the proposed project could potentially impact individual CRF if they are present within project sites DAV 016m3, DAV 017, DAV 018 and DAV 019m during project construction activities. No proposed construction activities are proposed directly within any aquatic breeding habitat. However, without mitigation measures, grading and earthmoving activities associated with work activities have the potential to crush individuals of this species should they be present within either of these project sites during project implementation.

Potential impacts to California red-legged frog: - Presence of this species is inferred based on potential habitat within the project area and proximity to a known occurrence of CRF (CNDDB 2017). This project, as mitigated, will not result in mortality of CRF and may result in insignificant effects to potential dispersal habitat. As a result, the project *may affect, but is not likely to adversely affect* CRF

Potential impacts to California red-legged frog Critical Habitat: - The project will not affect any critical habitat nor adversely modify any critical habitat for California red-legged frog.

Birds:

Implementation of the proposed project could potentially impact six special status individual and nesting migratory birds and raptor species (including Cooper's hawk, western burrowing owl, California yellow warbler, white-tailed kite, Pacific coast flycatcher, loggerhead shrike) should they become established within the proposed project site or buffer area prior to project implementation. The sites where these bird species could potentially be impacted are as follows:

Cooper's hawk:	Potential nesting habitat in buffer of DAV 021; potential foraging habitat at all sites.
California yellow warbler	Potential nesting and foraging habitat in buffer of DAV 021.
White-tailed kite	Potential nesting habitat at DAV 017 and DAV 021; potential foraging habitat at all sites.
Pacific-slope flycatcher	Potential nesting and foraging habitat in buffer of DAV 021.
Loggerhead shrike	Potential nesting and foraging habitat for this species was

observed in either the project sites or buffer areas of all project sites with the exception of the DAV 022m2 project site.

Burrowing owl — Potential habitat for this species was observed within the DAV 016m3, DAV 017, DAV 019m, and DAV 020m project sites and buffer areas.

Impacts to these species could occur through disturbance of nests or displacement / crushing of eggs or young by construction equipment during implementation of project activities. Actively nesting birds could also be disturbed by noise and vibration from project activities, if nests are located close enough to project activities. Project related noise and vibration could cause the abandonment of active nest sites. Impacts to these species would be considered potentially significant without mitigation measures. In the event that nesting birds become established in the proposed project site or buffer area, mitigation measures would be implemented, described below.

Bats

Implementation of the proposed project could potentially impact bat maternity sites (pallid, western red, and hoary bats) if these species are present in the DAV 021m project site or buffer area during implementation of the project and if they have established maternity or roosting sites. Impacts to bat maternity/roost sites would occur primarily from noise and vibration created from project construction equipment and construction related activities. Noise and vibration could lead to these bat species abandoning established roost/maternity sites. Direct mortality of these species could also occur if these species are present in any trees that are removed during project activities. Impacts to these species is considered potentially significant without mitigation measures. Proposed mitigation measures would be implemented, as described below.

Mitigation Measures

California Red-legged Frog (CRF):

BIO-1: The following measures shall be implemented at project sites DAV-016, DAV-017, DAV-018 and DAV-019 to avoid and minimize potential impacts to the California red-legged frog. Avoidance measures presented in the *Programmatic Biological Opinion* (USFWS 1999), and as developed by the County of Santa Cruz, would be adopted and implemented to prevent mortality of individuals during construction activities and removal of Pampas grass and other invasive vegetation.

- The applicant or project proponent shall submit the name(s) and credentials of qualified biologist to USFWS (Service) at least 15 days prior to the onset of

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

activities. The applicant or project proponent shall submit the name(s) and credentials of biologists who would conduct activities specified in the following measures. No project activities shall begin until proponents have received written approval from the Service that the biologist(s) is qualified to conduct the work.

- A Service-approved biologist shall survey the work site no more than 48 hours before the onset of any earth-moving activity, construction, or vegetation removal within project sites DAV 016, DAV 017, DAV 018 and DAV 019, whichever comes first. The preconstruction survey shall include two nights of nocturnal surveys in areas of suitable habitat.
- If any CRF are encountered during the surveys, all work in the work area shall be suspended while the findings are reported to the CDFW and USFWS and it is determined what, if any, further actions must be followed to prevent possible take of this species. If any red-legged frogs are required to be moved or relocated, only Service-approved biologists shall participate in activities associated with the capture, handling, and moving of California red-legged frogs.
- Before any activities begin on a project, a Service-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and its habitat, the importance of the California red-legged frog and its habitat, general measures that are being implemented to conserve the California red-legged frog as they relate to the project, and the boundaries within which the project may be accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions. All workers would be advised that equipment and vehicles must remain within the fenced work areas.
- Where construction would occur in CRF habitat where CRF are potentially present, off-road work areas (defined as including, but not necessarily limited to, construction and staging areas) would be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat areas. A qualified biologist would assist in determining the boundaries of the area to be fenced in consultation with the Santa Cruz County, USFWS, and CDFW.
- The authorized biologist would direct the installation of the fence and would conduct biological surveys to move any individuals of these species from within the fenced area to suitable habitat outside of the fence.

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

- Exclusion fencing would be at least 24 inches in height. The type of fencing must be approved by the authorized biologist, the USFWS, and CDFW. This fence should be permanent enough to ensure that it remains in good condition throughout the duration of the construction project on the project site. It should be installed prior to any site grading or other construction-related activities are implemented. The fence should remain in place during all site grading or other construction-related activities. The California red-legged frog exclusion fence could be "silt fence" that is buried along the bottom edge.
- If at any individuals of these species are found within an area that has been fenced to exclude these species, activities would cease until the authorized biologist moves the individuals.
- If any of these species are found in a construction area where fencing was deemed unnecessary, work would cease until the authorized biologist moves the individuals. The authorized biologist in consultation with USFWS and CDFW would then determine whether additional surveys or fencing are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist.
- Any individuals found during clearance surveys or otherwise removed from work areas would be placed in nearby suitable, undisturbed habitat. The authorized biologist would determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities.
- Clearance surveys shall occur on a daily basis in the work area.
- The authorized biologist would have the authority to stop all activities until appropriate corrective measures have been completed.
- To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force would be followed at all times.
- A Service-approved biologist shall be present at the work site until such time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance have been completed. After this time, the contractor or permittee shall designate a person to monitor on-site compliance with all minimization measures. The Service-approved biologist shall ensure that this individual receives training outlined in measure 3 above and in the identification of California red-legged frogs. The monitor and the Service-

approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated during review of the proposed action. If work is stopped, Service shall be notified immediately by the Service-approved biologist or on-site biological monitor

- The number of access routes, number and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly demarcated, and these areas shall be outside of riparian and wetland areas. Where impacts occur in these staging areas and access routes, restoration shall occur as identified by BIO-1 herein.
- Work activities shall be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the USFWS may authorize such activities. Project activities shall be limited to daylight hours, except during an emergency, in order to avoid nighttime activities when CRF frogs may be present.
- Traffic speed should be maintained at 20 miles per hour or less in the work area.
- As consistent with the native landscape screening required by the site plan for DAV 016 (Application 161248), and the Coastal scrub revegetation and possible relocation requirements provided by *BIO-4,* project sites DAV 016, DAV 018 and DAV 019 shall be revegetated with an appropriate assemblage of native upland vegetation suitable for the area. A species list and restoration and monitoring plan shall be included with the project proposal for review and approval by County prior to building permit issuance for these sites. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work would be done, identifiable success criteria for completion, and remedial actions if the success criteria are not met.

Birds:

Implementation of mitigation measures BIO-2A and BIO-2B would reduce the potential impact to bird species to a level of less-than-significant.

BIO-2A: The following measures shall be implemented at the project sites or buffer areas of all project sites with the exception of the DAV 022m2, to avoid and minimize potential impacts to nesting birds. If ground disturbing activities occur during the breeding season of migratory avian or raptor species (February through mid-September), surveys for active nests would be conducted by a qualified biologist no more than 10 days prior to start of activities. Pre-construction nesting

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

surveys shall be conducted for nesting migratory avian and raptor species in the project site and buffer area. Pre-construction biological surveys shall occur prior to the proposed project implementation, and during the appropriate survey periods for nesting activities for individual avian species. Surveys would follow required CDFW and USFWS protocols, where applicable. A qualified biologist would survey suitable habitat for the presence of these species. If a migratory avian or raptor species is observed and suspected to be nesting, a buffer area would be established to avoid impacts to the active nest site. Identified nests should be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed and no further mitigation measures would be required. If active nesting sites are found, the following exclusion buffers would be established, and no project activities would occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest or parental care for survival.

- Minimum no disturbance of 250 feet around active nest of non-listed bird species and 250 foot no disturbance buffer around migratory birds;
- Minimum no disturbance of 500 feet around active nest of non-listed raptor species;
- and 0.5-mile no disturbance buffer from listed species and fully protected species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.
- Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change should cease and the appropriate regulatory agencies (i.e. CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures.
- An alternative setback from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any alternative setback from these buffers is advised to be supported by a qualified wildlife biologist and is recommended that CDFW and USFWS be notified in advance of implementation of a no disturbance buffer variance.

BIO-2B: The following measures included in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) shall be implemented by the biological consultant for the proposed sites DAV 016m3, DAV 017, DAV 019m, and DAV 020m.

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

a. If preconstruction surveys determine that burrowing owls are present in the proposed project sites and/or buffer areas, a burrowing owl mitigation plan shall be prepared by a qualified biologist describing recommended site specific shelter-in-place measures, worker training, and/or other measures to ensure that Project construction does not result in adverse impacts to the burrowing owls.

b. Occupied burrows shall not be disturbed during the burrowing owl nesting season (February 1 through August 31) unless a qualified biologist approved by the CDFW verifies through non-invasive methods that either: (1) the birds have not begun egg-laying and incubation; or (2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

c. Burrowing owls present in the project sites or within 500 feet (as identified during preconstruction surveys) shall be moved away from the disturbance area using passive relocation techniques. Prior to commencement of relocation, a management plan shall be prepared and approved by CDFW. Relocation shall be completed between September 1 and January 31 (outside of breeding season). A minimum of one or more weeks is required to relocate the owls and allow them to acclimate to alternate burrows. Passive relocation techniques would follow the CDFG Staff Report on Burrowing Owl Mitigation Guidelines (2012) and include the following measures:

   i. Install one-way doors in burrow entrances. Leave doors in place for 48 hours to ensure owls have left the burrow.

   ii. Allow one or more weeks for owls to acclimate to off-site burrows. Daily monitoring shall be required for the passive relocation period.

   iii. Once owls have relocated off-site, collapse existing burrows to prevent reoccupation. Prior to burrow excavation, flexible plastic pipe shall be inserted into the tunnels to allow escape of any remaining owls during excavation. Excavation shall be conducted by hand whenever possible.

   iv. Destruction of burrows shall occur only pursuant to a management plan approved by CDFW.

   v. As an alternative (if approved by CDFW), all occupied burrows identified off-site within 500 feet of construction activities outside of nesting season (September through January) and during nesting season (February 1 through August 31) could be buffered by hay bales, fencing (e.g. sheltering in place) or as directed by a qualified biologist and the CDFW.

Bats:

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

Implementation of mitigation measure BIO-3 would reduce the potential impact to bat species to less than significant.

BIO-3: In the event any tree removal is necessary on project site DAV 021m, and to prevent direct mortality of bats roosting in the trees on the project site, a bat habitat assessment must be conducted by a qualified bat biologist that should be conducted 3 to 6 months prior to tree removal. Tree removal must only occur during seasonal periods of bat activity, between March 1, or when evening temperatures are above 45F and rainfall less than 1/2" in 24 hours occurs, and April 15, prior to parturition of pups. The next acceptable period for tree removal with suitable roosting habitat is after pups become self-sufficient – September 1 through about October 15, or prior to evening temperatures dropping below 45F and onset of rainfall fretter than 1/2" in 24 hours.

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 Wildlife or U.S. Fish and Wildlife Service?*	☐	☒	☐	☐

Discussion: One native plant community would be potentially impacted by the proposed project: Coastal scrub. Two varieties of the Coastal scrub plant community were observed within parts of the project area: California sagebrush scrub and coyote bush scrub. The Coastal scrub plant community is a sensitive community identified by the County General Plan.

Impacts

The proposed project would permanently impact up to 400 square feet (<.01 acres) of existing or potential Coastal scrub. Construction activities at the DAV 016, DAV 018, DAV 019, and DAV 020 project sites would result in the removal of individuals or parts of the shrub canopy of native coyote bushes and California sage plants that occur within part of the construction site during the installation of project components. The sites with the greatest quality and concentration of Coastal scrub habitat are DAV 018 and DAV 016. Please refer to site photographs provided in Attachment 7 - the shrubs and Seaside daisies visible in the photographs are elements of the sensitive native plant community.

The biotic consultant met with Santa Cruz County Planning Department staff on-site on July 18, 2017, and during the course of the meeting, discussed the re-vegetation of the sites, including coyote bush and California sage plantings. The purpose of this effort is to

maintain the visual character of the sites and screen equipment cabinets, as well as maintain the current vegetation cover and genetic diversity of these plants on the site.

Construction activities have the potential to introduce new invasive plant species onto the proposed project sites and surrounding areas. These new invasive plant species could be carried onto the project sites on construction equipment used at other sites outside of project area. Proposed project activities also have the potential to spread invasive plant species populations already present within the proposed project sites through the use of construction equipment and the improper disposal of invasive plants removed from areas of the project site. The spreading of invasive weed and non-native plant species to the project sites could potentially lead to reductions or complete absence of native plants within the proposed project sites. Previous ground disturbance has allowed pampas grass to become established in the buffer areas of Project Sites DAV 018 and DAV 019m.

Construction Management Practices

Construction BMPs would be incorporated in the construction of the project to minimize adverse effects on soils, drainage and biotic resources at all sites. These include, but are not limited to, the following:

- To avoid debris contamination into drainages and other sensitive wildlife habitats, silt fence or other sediment control devices would be placed around construction sites to contain spoils from construction excavation activities.
- Surveys for special-status species (i.e., plants, amphibians, birds, bats) by qualified biologists shall be conducted at the appropriate times before construction starts to determine occupancy at the site. If no special-status species are found, no further action other than the Best Management Practices identified above are required. If individuals are found, including plants or nesting birds, a buffer zone around the species or nest would be required at a sufficient distance to prevent take of individual plants, or until after the nesting season.
- Due to the potential for special-status species to occur, move through, or into the project area, an on-site biological monitor, shall at a minimum, check the ground beneath all equipment and stored materials each morning before construction starts to prevent take of individuals. All pipes or tubing 4 inches or greater shall be sealed by the relevant contractor with tape at both ends to prevent animals from entering the pipes at night. All trenches and other excavations shall be backfilled the same day they are opened, or shall have an exit ramp built into the excavation to allow animals to escape.
- Environmental Awareness Training shall be presented to all personnel working in the field on the proposed project site. Training shall consist of a brief presentation in which biologists knowledgeable of endangered species biology and legislative

protection shall explain endangered species concerns. Training shall include a discussion of special-status plants and sensitive wildlife species. Species biology, habitat needs, status under the Endangered Species Act, and measures being incorporated for the protection of these species and their habitats shall also be discussed.

- Project site boundaries shall be clearly delineated by stakes and /or flagging to minimize inadvertent degradation or loss of adjacent habitat during project operations. Staff and/or its contractors shall post signs and/or place fence around the project site to restrict access of vehicles and equipment unrelated to drilling.
- The facilities would be constructed to current construction-industry standards and codes.

Best management practices for staging areas and fueling, as provided by the Biotic Report (Attachment 4) would be required.

Mitigation Measures

Implement the following measures at sites DAV O16, DAV 018, DAV 019 and DAV 020 to avoid and mitigate impacts to Coastal Scrub Plant Community. The following mitigation measures would reduce significant impacts to a less than significant level:

BIO-4: The mitigation measures provided in *BIO-5* to insure that the project is configured to minimize disturbance of Coastal Scrub habitat shall be implemented. Consistent with implementation of *BIO-5,* and prior to issuance of a building permit for sites DAV O16, DAV 018, DAV 019 and DAV 020, a qualified biologist would inventory the coyote bush, California sage plants, lizard tail and Seaside daisy (*Erigeron glaucus*) at each site and get an accurate number of plants that are proposed for removal.

Plans submitted with building permit applications shall include both construction and staging areas, and disturbance envelopes.

After construction is complete, the biological consultant would employ or contract an entity qualified in habitat restoration (landscape architect or restoration consultant) to implement a Coastal scrub re-vegetation and restoration plan.

During all plant restoration activities on subject sites, including planting activities and removal of Pampas grass and other invasive plants, the red-legged frog avoidance and mitigation measures provided in BIO-1 shall be implemented.

Plantings shall be based on a planting plan (include species, number, location and tank location and dimensions) submitted to the County for approval prior to

building permit issuance. Two times the number of plants removed shall be planted.

The restoration contractor shall include a recommendation on the feasibility of transplanting *Dudlea palmerii* from disturbance envelope. *D. palmerii* is not a sensitive species but part of the Coastal scrub community.

The contractor would prepare the soil for planting. The plants would be planted in the prepared soils, and mulch would be placed around the plants to maintain moisture. A system of irrigation lines would be laid through the revegetation area, and would be hooked up to an irrigation water tank. The contractor would refill the water tank on a regular basis during the non-rainy season of the year. No watering would be required during the rainy season. The biological consultant would establish a regular yearly schedule with the contractor and the Santa Cruz County Planning Department to conduct site visits to assess the revegetation efforts.

Planting shall utilize plant propagules collected from Santa Cruz County, obtained from native plant nurseries that employ Best Management Practices (BMP's) that control or eliminate the diseases caused by *Phytopthora ramorum*, as outlined by the California Oak Mortality Task Force.

If during the site visits it is determined that individual plants are dying or dead, they may need to be replaced by the contractor. Yearly visits and replantings shall occur until the replanted bushes have re-established successfully.

Maintain 80% survival of installed stock in Years 1-3. Install replacement plants as needed to meet survival rates. If substantial replanting is necessary, the maintenance and monitoring period may need to be extended so that each site is maintained and monitored for 5 years.

Maintain and monitor the site annually for to insure success criteria have been met. Submit annual reports to County Planning Department by December 31 of each monitoring year.

The biological consultant shall remove non-native invasive Pampas grass populations from the DAV 018 and DAV 019m project sites and surrounding buffer areas.

The biological consultant shall hire an invasive weed consultant that is experienced in the removal of invasive noxious weeds, including Pampas grass.

The consultant would remove all Pampas grass from the sites using hand tools, shovels, and other mechanical means to remove all root systems and above ground portions of the plants. No herbicides shall be used at removal sites. The

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

consultant would then stabilize the soils at the areas of removal and revegetate the disturbed soils with native species. The biological consultant would establish a schedule with the consultant to revisit the site once a year to remove any additional Pampas grass and reapply chemical controls. The biological consultant would correspond with Santa Cruz County Planning Department to coordinate this schedule. The biological consultant would continue the annual visits until the Pampas grass does not regrow for two years.

Invasive weeds shall be controlled at the construction site for the first three years after construction to less than 5% each year. Invasive species shall be characterized as those designated by Water Use Classifications of Landscape Species (WUCOLS III).

Consultant shall remove all invasive vegetation from the sites using hand tools, shovels, and other mechanical means to remove root systems and above ground portions of the plants. No herbicides shall be used at removal sites. The consultant would then stabilize the soils at the areas of removal so that native vegetative species can re-establish. The biological consultant would establish a schedule with the consultant to revisit the site once a year to remove any additional invasive plants. The biological consultant would correspond with Santa Cruz County Planning Department to coordinate this schedule. The biological consultant would continue the annual visits for three years.

With mitigation this impact is reduced to a level of less than significant.

3.	*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?*	☐	☐	☐	☒

Discussion: There are no mapped or designated federally protected wetlands on or adjacent to the project site. Therefore, no impacts would occur from project implementation.

4	*Interfere substantially with the movement of any native resident or migratory fish or wildlife species or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*	☐	☒	☐	☐

Discussion: The proposed project does not involve any activities that impede use of a

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

known wildlife nursery site. Project construction activities could potentially interfere with the movement of California red-legged frog between breeding ponds, upland aestivation areas and other habitat areas.

Mitigation measures

BIO-5: Where erosion, sediment and drainage control is installed, it shall be configured as provided in *BIO-1* to avoid and mitigate potential CRF movement into site construction zones. Biologic site monitor will be required to prevent CRF from entering construction zone and will use safe methods as described in *BIO-1* as applicable to guide or transfer CRF around construction zones. These measures, combined with mitigation measures *BIO 1-5* would reduce potential impacts to a level of less than significant.

5. *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)?*	☐	☒	☐	☐

Discussion: Coastal scrub plant communities are found on DAV 016, DAV 018, DAV 019 and DAV 020. Coastal scrub is designated as environmentally sensitive habitat by the Santa Cruz County General Plan and the County Code. With implementation of the mitigation measures described below and under D-1 and D-2 above, the project would not conflict with any local policies or ordinances.

Environmentally Sensitive Habitat

The California Coastal Act policies for Environmentally Sensitive Habitat Areas are implemented by the Santa Cruz County LCP through SCCC Ch. 16.32, which requires evaluation of effects in a Biotic Report and implementation of conditions to minimize adverse impacts to the subject habitat. The applicable code sections follow:

16.32.090 Approval conditions.

(A) Conditions of approval shall be determined by the Environmental Coordinator through the environmental review process. These conditions may be based on the recommendations of the biotic assessment or biotic report and shall become conditions of any subsequent approval issued for the property. Such conditions shall also apply to all development activities engaged in on the property. Any additional measures deemed necessary by the Decision-Making Body shall also become development permit conditions. Exceptions may be granted by the Decision-Making Body subject to the provisions of SCCC 16.32.100.

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

(B) The following conditions shall be applied to all development within any sensitive habitat area:

(1) All development shall mitigate significant environmental impacts, as determined by the Environmental Coordinator.

(2) Dedication of an open space or conservation easement or an equivalent measure shall be required as necessary to protect the portion of a sensitive habitat which is undisturbed by the proposed development activity or to protect a sensitive habitat on an adjacent parcel.

(3) Restoration of any area which is a degraded sensitive habitat or has caused or is causing the degradation of a sensitive habitat shall be required; provided, that any restoration required shall be commensurate with the scale of the proposed development.

(C) All development activities in or adjacent to a sensitive habitat area shall conform to the following types of permitted uses, and the following conditions for specific habitats shall become minimum permit conditions unless the approving body pursuant to Chapter 18.10 SCCC finds that the development would not affect the habitat based on a recommendation of the Environmental Coordinator following a biotic review pursuant to SCCC 16.32.070:

Coastal scrub: Land clearing shall be minimized.

As described Sections D-1 and D-2 above, a Biotic Report was provided and mitigation measures incorporated to minimize land clearing and minimize impacts to and disturbance of sensitive wildlife species and the Coastal scrub plant community, and to require restoration and revegetation of Coastal scrub community plants.

Mitigation measure

BIO-6: At project sites DAV 016, DAV 018, DAV 019 and DAV 020 the conditions of approval would include the conditions above. In addition, the following mitigation and monitoring measures would be implemented:

1. Disturbance and removal of coastal scrub habitat shall be minimized to the greatest extent technically feasible without violating scenic protection policies and findings.
2. Prior to building permit approval, the following measures would be implemented:
   a. The applicant shall stake the permanent and temporary disturbance envelopes (including, but not necessarily limited to, construction and staging areas) and tag with orange survey ribbons the Coastal scrub bushes targeted for removal, based on the site plans attached to this Initial Study.
   b. The applicant shall meet with County staff for a pre-construction review at sites DAV 016, DAV 018, DAV 019 and DAV 020 for a discussion of potential project

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

modifications to minimize disturbance of Coastal scrub habitat.

c. Following the site inspection, the applicant shall provide a site plan revised as necessary for compliant disturbance, including construction areas, staging areas and areas for temporary storage of excavated materials.

d. Prior to construction, the applicant would install protective fencing around bushes and other sensitive Coastal scrub areas to be maintained adjacent to the construction envelope.

Impacts from project implementation would be less than significant with mitigation incorporated.

6.	*Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*	☐	☐	☐	☒

Discussion: The proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

7.	*Produce nighttime lighting that would substantially illuminate wildlife habitats?*	☐	☐	☐	☒

Discussion: All construction would be completed during daylight hours. No nighttime lighting impacts from project implementation would occur.

E. 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?*	☐	☐	☐	☒

Discussion: The existing power poles and wires on the proposed sites are not designated as a historic resource on any federal, state or local inventory. None of the residences or commercial buildings adjoining any sites are designated historic resources As a result, no impacts to historical resources would occur from project implementation.

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

Discussion: An Archeological Survey Report was prepared by David Brunzell, dated July

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

25, 2017, (Attachment 6). The report included a literature search, tribal consultation and site surveys. Prior to fieldwork, a records search was conducted by the NWIC. This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resource surveys and excavation reports generated from projects located within one half-mile of the project sites. In addition, a review was conducted of the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and documents and inventories from the California Office of Historic Preservation including the lists of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and the Inventory of Historic Structures.

Field Survey

A pedestrian and windshield-style archaeological field survey of all seven project sites was conducted on July 9, 2017. The survey was conducted by locating each proposed node sites and inspecting undisturbed surface areas on foot. Where visible, soil exposures and rodent back dirt were carefully examined for cultural resources.

Personnel from the Northwest Information Center (NWIC) at Rohnert Park completed the records search for the project on July 19, 2017. This research has revealed 12 cultural resources located within a half-mile radius of the proposed site locations. Of these resources, eight are prehistoric habitation sites, and four are historic-period resources.

During the field survey, BCR Consulting archaeologists inspected each of the proposed impact areas within the project site. No previously unrecorded prehistoric or historic archaeological resources were identified within any of the project site boundaries. Throughout most of the project sites, ground visibility was obscured by dense vegetation. Ground disturbances were also severe in most locations, and included grading, landscaping, and other disturbances related to adjacent roads.

Conclusion

Project site DAV 022 is potentially sensitive for buried cultural resources due to its proximity to a known prehistoric archaeological resource.

Mitigation measures

ARCH-1: The following mitigation measures would be implemented at project site DAV 022. Pursuant to Section 16.40.040 of the Santa Cruz County Code, archaeological monitoring would be required for any excavation associated with this project site. If at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the

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

coroner determines that 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.

With the mitigation measures, impacts are expected to be less than significant.

3. *Disturb any human remains, including those interred outside of dedicated cemeteries?*	☐	☒	☐	☐

Discussion: An Archeological Report was prepared for the project sites by David Brunzell, dated July 25, 2017, (Attachment 6). In addition, a Section 106 report, FCC / NEPA Environmental Compliance Checklist was submitted for all sites, prepared by Trileaf Corporation, dated September 13, 2017. The archeological reports included a tribal consultation, through which all tribes confirmed clearance either directly or by default via the FCC referral process. Trileaf has determined that the subject property is not located on or near an indigenous people's religious or sacred site.

No archeological or historic resources were document or discovered on any of the subject project sites.

Mitigation Measures

ARCH-2: Pursuant to Section 16.40.040 of the Santa Cruz County Code, and consistent with State Health and Safety Code §7050.5 and Public Resources Code Section 5097.98, if at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full 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.

4. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*	☐	☐	☐	☒

Discussion: No unique paleontological resources or unique geologic features are known to occur in the vicinity of the proposed project. No impacts are anticipated.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
F. 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.*	☐	☐	☒	☐
B. *Strong seismic ground shaking?*	☐	☐	☒	☐
C. *Seismic-related ground failure, including liquefaction?*	☐	☐	☒	☐
D. *Landslides?*	☐	☐	☒	☐

***Discussion (A through D)*:** The project site is located outside of the limits of the State Alquist-Priolo Special Studies Zone (County of Santa Cruz GIS Mapping, California Division of Mines and Geology, 2001), approximately 14 mile(s) southwest of the San Andreas fault zone, and approximately 8 mile(s) southwest of the Zayante fault zone. While the San Andreas fault is larger and considered more active, each fault is capable of generating moderate to severe ground shaking from a major earthquake. Consequently, large earthquakes can be expected in the future. The October 17, 1989 Loma Prieta earthquake (magnitude 7.1) was the second largest earthquake in central California history.

All of Santa Cruz County is subject to some hazard from earthquakes. However, the project site is not located within or adjacent to a County or state mapped fault zone, therefore the potential for ground surface rupture is low. The project site is likely to be subject to strong seismic shaking during the life of the improvements. The improvements would be designed in accordance with the Uniform Building Code, which should reduce the hazards of seismic shaking and liquefaction to a less than significant level. There is no indication that landsliding is a significant hazard at this site.

2. *Be located on a geologic unit or soil that is unstable, or that would become unstable*	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				

Discussion: Following a review of mapped information and a field visit to the site, there is no indication that the development site is subject to a significant potential for damage caused by any of these hazards.

3. *Develop land with a slope exceeding 30%?*	☐	☐	☒	☐

Discussion: There are slopes that exceed 30% on the property. However, no improvements are proposed on slopes in excess of 30%.

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

Discussion: Some potential for erosion exists during the construction phase of the project, however, this potential is minimal because minimal grading is proposed and standard erosion controls are a required condition of the project. Prior to approval of a grading or building permit, the project must have an approved Erosion Control Plan (*Section 16.22.060 of the County Code*), 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. Impacts from soil erosion or loss of topsoil would be considered less than significant.

The project would be conditioned to require the Construction Best Management Practices required as mitigation measure *BIO-4* in Section D-1 above, providing site erosion, sediment and drainage and drainage control. Project would have less than significant impact as conditioned.

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?*	☐	☐	☐	☒

Discussion: There is no indication that the development site is subject to substantial risk caused by expansive soils. Therefore, no impact is anticipated.

6. *Have soils incapable of adequately supporting the use of septic tanks, leach fields, or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*	☐	☐	☐	☒

Discussion: No septic systems are proposed.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Result in coastal cliff erosion?	☐	☐	☐	☒

Discussion: The proposed project is not located in the vicinity of a coastal cliff or bluff; and therefore, would not contribute to coastal cliff erosion. No impact is anticipated.

G. GREENHOUSE GAS EMISSIONS

Would the project:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Discussion: The proposed project, like all development, would be responsible for an incremental increase in greenhouse gas emissions by usage of fossil fuels during the site grading and construction. Santa Cruz County has recently adopted a Climate Action Strategy (CAS) 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. The strategy intends to reduce greenhouse gas emissions and energy consumption by implementing measures such as reducing vehicle miles traveled through the County and regional long range planning efforts and increasing energy efficiency in new and existing buildings and facilities. All project construction equipment would be required to comply with the Regional Air Quality Control Board emissions requirements for construction equipment. As a result, impacts associated with the temporary increase in greenhouse gas emissions are 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?	☐	☐	☐	☒

Discussion: See the discussion under G-1 above. No significant impacts are 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 of hazardous materials?	☐	☐	☒	☐

Discussion: The proposed project would not create a significant hazard to the public or the environment. No routine transport or disposal of hazardous materials is proposed. However, during construction, fuel would be used at the project site, however, no fueling is expected to occur within construction sites. Impacts are expected to be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?*	☐	☐	☒	☐

Discussion: Please see discussion under H-1 above. Project impacts would be considered less than significant.

3. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*	☐	☐	☐	☒

Discussion: One school is located at 50 Ocean St., Davenport, approximately 300 feet to the east of the project site for microcell site (171059, DAV 022). Fueling of equipment is unlikely to occur within the construction area. No impacts are anticipated.

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?*	☐	☐	☐	☒

Discussion: The project site is not included on the list of hazardous sites in Santa Cruz County compiled pursuant to Government Code Section 65962.5. No impacts are anticipated from project implementation.

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 result in a safety hazard for people residing or working in the project area?*	☐	☐	☐	☒

Discussion: The proposed project is not located within two miles of a public airport or public use airport. No impact is anticipated.

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?*	☐	☐	☐	☒

Discussion: The proposed project is not located in the vicinity of a private airstrip.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
7. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*	☐	☐	☐	☒

Discussion: The proposed project would not conflict with implementation of the County of Santa Cruz Local Hazard Mitigation Plan 2015-2020 (County of Santa Cruz, 2020). Therefore, no impacts to an adopted emergency response plan or evacuation Plan would occur from project implementation.

8. *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?*	☐	☐	☒	☐

Discussion: Although one of the proposed project sites (DAV 019) is located in a Fire Hazard Area, the project design incorporates all applicable fire safety code requirements as required by the local fire agency. Impacts would be less than significant.

I. HYDROLOGY, WATER SUPPLY, AND WATER QUALITY

Would the project:

1. *Violate any water quality standards or waste discharge requirements?*	☐	☐	☒	☐

Discussion: The project would not discharge runoff either directly or indirectly into a public or private water supply. No commercial or industrial activities are proposed that would contribute contaminants. Potential siltation from the proposed project would be addressed through implementation of erosion control best management practices (BMPs). No water quality standards or waste discharge requirements would be violated. Impacts would be less than significant.

2. *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)?*	☐	☐	☐	☒

Discussion: The project would not require ongoing water use. No impact is anticipated.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*	☐	☐	☒	☐

Discussion: One proposed site (161248, DAV 018) is located approximately 115 feet from an unnamed creek that discharges near Davenport Landing Road, and one site (161253; DAV 021) is on road shoulder approximately 65 feet from San Vincente Creek. These have the potential to generate minor, short-term water quality impacts during construction. However, the proposed project would be consistent with County Code Section 7.79.070, which states, "No person shall make any unpermitted alterations to drainage patterns or modifications to the storm drain system or any channel that is part of receiving waters of the county. No person shall deposit fill, debris, or other material in the storm drain system, a drainage channel, or on the banks of a drainage channel where it might enter the storm drain system or receiving waters and divert or impede flow." An erosion control plan would also be required per Section 16.22.060 of the County Code. No construction would occur until the Department of Public Works Drainage Section approves the drainage plan. Impacts would be less than significant.

4. *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?*	☐	☐	☒	☐

Discussion: The proposed project is located near two watercourses (see I3 above), but would not alter the existing overall drainage pattern of the sites. Department of Public Works Drainage Section staff would review the proposed drainage plan. Impacts from project construction would be less than significant.

5. *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?*	☐	☐	☒	☐

Discussion: No increase in stormwater runoff rates or volumes is expected as part of the project. Refer to response I-1 for discussion of urban contaminants and/or other polluting runoff. Impacts would be considered less than significant.

6. *Otherwise substantially degrade water*	☐	☐	☒	☐

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

quality?

Discussion: Please see discussion under I-1 above. Impacts would be considered less than significant with the implementation of BMPs.

7. *Place housing 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?*	☐	☐	☐	☒

Discussion: No housing development is proposed. Impacts from project implementation are expected to have no impact.

8. *Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*	☐	☐	☐	☒

Discussion: According to the Federal Emergency Management Agency (FEMA) National Flood Insurance Rate Map, dated May 16, 2012, one project site (161253, DAV 021) lies within a 100-year flood hazard area. However, the proposed project would not impede or redirect flood flows. No impact would occur.

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?*	☐	☐	☐	☒

Discussion: The proposed project would not increase the risk of flooding and would not lead to the failure of a levee or dam. No impact would occur.

10. *Inundation by seiche, tsunami, or mudflow?*	☐	☐	☐	☒

Discussion: There are two primary types of tsunami vulnerability in Santa Cruz County. The first is a tele-tsunami or distant source tsunami from elsewhere in the Pacific Ocean. This type of tsunami is capable of causing significant destruction in Santa Cruz County. However, this type of tsunami would usually allow time for the Tsunami Warning System for the Pacific Ocean to warn threatened coastal areas in time for evacuation (County of Santa Cruz 2010).

The more vulnerable risk to the County of Santa Cruz is a tsunami generated as the result of an earthquake along one of the many earthquake faults in the region. Even a moderate earthquake could cause a local source tsunami from submarine landsliding in Monterey Bay. A local source tsunami generated by an earthquake on any of the faults affecting Santa Cruz County would arrive just minutes after the initial shock. The lack of warning time from

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

such a nearby event would result in higher causalities than if it were a distant tsunami (County of Santa Cruz 2010).

The project sites are located inland beyond the effects of a tsunami. In addition, no impact from a seiche or mudflow is anticipated. No impact would occur.

J. LAND USE AND PLANNING

Would the project:

1.	*Physically divide an established community?*	☐	☐	☐	☒

Discussion: The proposed project does not include any element that would physically divide an established community. No impact would occur.

2.	*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?*	☐	☐	☐	☒

Discussion: The proposed project conflicts with Santa Cruz County Code Section with any regulations or policies adopted for the purpose of avoiding or mitigating an environmental effect. No impacts are anticipated.

3.	*Conflict with any applicable habitat conservation plan or natural community conservation plan?*	☐	☐	☐	☒

Discussion: Section A above specifically addresses General Plan Policies 5.10.11 and 5.10.13, and Santa Cruz County Code sections 13.10.660-668, regarding scenic resources. General Plan provisions for sensitive wildlife and environmentally sensitive habitat are implemented by Santa Cruz County Code sections 16.32.070, 16.32.090, 16.32.100, cited and addressed in Section D above. SCCC section 16.40.040, addressing archeologic resources, is discussed and addressed in Section E above. With the discussion and mitigation measures provided by these sections, the project would not conflict with any applicable habitat conservation plan or natural community conservation plan. No impact would occur.

K. 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?*	☐	☐	☐	☒

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

Discussion: The site does not contain any known mineral resources of value to the region and the residents of the state. Therefore, no impact is anticipated from project implementation.

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?*	☐	☐	☐	☒

Discussion: The project site is not considered to be an Extractive Use Zone (M-3) nor does it have a Land Use Designation with a Quarry Designation Overlay (Q) (County of Santa Cruz 1994). Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan would occur as a result of this project.

L. NOISE

Would the project result in:

1. *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*	☐	☒	☐	☐

Discussion: The Santa Cruz County General Plan (County of Santa Cruz 1994) contains the following table, which specifies the maximum allowable noise exposure for stationary noise sources (Table 2). The County of Santa Cruz has not adopted noise thresholds for construction noise.

The following applicable noise related policy is found in the Public Safety and Noise Element of the Santa Cruz County General Plan (Santa Cruz County 1994).

- Policy 6.9.7 Construction Noise. Require mitigation of construction noise as a condition of future project approvals.

Table 2: Maximum Allowable Noise Exposure for Stationary Noise Sources[1]

	Daytime[5] (7:00 am to 10:00 pm)	Nighttime[2, 5] (10:00 pm to 7:00 am)
Hourly Leq average hourly noise level, dB[3]	50	45
Maximum Level, dB[3]	70	65
Maximum Level, dB – Impulsive Noise[4]	65	60

Notes:
1 As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied to the receptor side of noise barriers or other property line noise mitigation measures.
2 Applies only where the receiving land use operates or is occupied during nighttime hours

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

3 Sound level measurements shall be made with "slow" meter response.
4 Sound level measurements shall be made with "fast" meter response
5 Allowable levels shall be raised to the ambient noise levels where the ambient levels exceed the allowable levels. Allowable levels shall be reduced to 5 dB if the ambient hourly Leq is at least 10 dB lower than the allowable level.
Source: County of Santa Cruz 1994

County of Santa Cruz Code

There are no County of Santa Cruz ordinances that specifically regulate construction noise levels. However, Section 8.30.010 (Curfew—Offensive noise) of the Santa Cruz County Code contains the following language regarding noise impacts:

(A) No persons shall, between the hours of ten p.m. and eight a.m., make, cause, suffer, or permit to be made any offensive noise:

1. Which is made within one hundred feet of any building or place regularly used for sleeping purposes; or

2. Which disturbs any person of ordinary sensitivities within his or her place of residence

(B) Offensive noise" means any noise which is loud, boisterous, irritating, penetrating, or unusual, or that is unreasonably distracting in any other manner such that it is likely to disturb people of ordinary sensitivities in the vicinity of such noise, and includes, but is not limited to, noise made by an individual alone or by a group of people engaged in any business, activity, meeting, gathering, game, dance, or amusement, or by any appliance, contrivance, device, tool, structure, construction, vehicle, ride, machine, implement, instrument or vehicle.

Any new or additional noise ordinance provisions of the County Code that are not currently in effect, but that are in effect at the time of discretionary review or building permit application, shall be applied to the project as appropriate.

Sensitive Receptors:

Some land uses are generally regarded as being more sensitive to noise than others due to the type of population groups or activities involved. Sensitive population groups generally include children and the elderly. Noise sensitive land uses typically include all residential uses (single- and multi-family, mobile homes, dormitories, and similar uses), hospitals, nursing homes, schools, and parks.

The use of construction equipment to accomplish the proposed project would result in noise in the project area, i.e., construction zone. Table 3 (below) shows typical noise levels for common construction equipment. The sources of noise that are normally measured at 50 feet, are used to determine the noise levels at nearby sensitive receptors by attenuating 6 dB for each doubling of distance for point sources of noise such as operating construction equipment.

Noise levels at the nearest sensitive receptors for each site were analyzed on a worst-case basis, using the equipment with the highest noise level expected to be used.

Sensitive receptors are located approximately 52 feet to the east of the construction site for 161253 (DAV 021) on San Vicente Road, 150 feet to the north of the construction site for 161249 (DAV 017)1st Ave., 110 feet to the northeast of 171059 (DAV 022) at Marine View, 350 feet to the southwest of 161252 (DAV 020) and 750 feet to the northwest of 161250 (DAV 018) at Old Coast Road.

Table 3: Typical Noise Levels for Common Construction Equipment (at 50 feet)

Equipment	L_{max} (dBA)
Air Compressor	81
Backhoe	80
Cement Mixer Truck	85
Cement Pump Truck	82
Chain Saw	85
Compactor	82
Crane	83
Concrete Saw	90
Dozer	85
Excavator	85
Dump Truck	84
Flat Bed Truck	84
Front End Loader	80
Fork Lift	75
Generator	81
Grader	85
Hoe-rams	90
jackhammers	88
Paver	85
Pick-up Truck	55
Pneumatic Tools	85
Rollers	74
Tree Chipper	87

Source: Federal Transit Authority, 2006.

Impacts

Although construction activities would likely occur during daytime hours, noise may be audible to nearby residents. However, periods of noise exposure would be very short term and temporary, lasting less than a few days at any of the sites listed above.

Potential Temporary Construction Noise Impacts

Construction activity would be expected to use equipment listed in Table 3. Based on the activities proposed for the proposed project, the equipment with the loudest operating noise level that would be used often during activity would be excavating equipment (jack hammer, backhoe) used to create holes for pole and utility box or vault placement at 171059 (DAV 022), 1610250 (DAV 018) and 161252 (DAV 020), which would produce noise levels of 85-90 dBA at a distance of 50 feet The nearest sensitive receptor is located approximately 100 feet from the construction site at 171059 (Marine View). At that distance, the decibel level is reduced by approximately six decibels. However, these impacts would also be intermittent and temporary, and would occur during a period of only 1-2 days. The nearest sensitive receptor is located approximately 200 feet from the construction site at 161252 (DAV 020), a distance at which the decibel level is reduced by approximately 12 decibels, to 73-78 decibels. Installation of the vault would require intermittent excavation activity over a period of no more than 1-3 days. The nearest sensitive receptor is located approximately 750 feet from the construction site at 161250 (DAV 018), a distance at which the decibel level is reduced by approximately 23 decibels, to approximately 62-67 dB. At the other construction sites, excavation activity would be negligible to absent. (Reference: standard noise attenuation equation, provided by http://sengpielaudio.com/calculator-distance.htm.)

The County of Santa Cruz has not adopted significance thresholds for construction noise.

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

However, •Policy 6.9.7 of the General Plan requires mitigation of construction noise as a condition of future project approvals.

The following mitigation measures would be required to assist in the reduction of temporary construction noise impacts. With the implementation of those measures, no adverse noise impacts are expected occur during construction activities.

Mitigation Measures

NOI-1 Limit construction activity to between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. Saturday in order to avoid noise during more sensitive nighttime hours. Prohibit construction activity on Sundays.

NOI-2 Require that all construction and maintenance equipment powered by gasoline or diesel engines have sound-control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.

NOI-3 Prohibit gasoline or diesel engines from having unmuffled exhaust.

NOI-4 Use noise-reducing enclosures around stationary noise-generating equipment capable of 6 dB attenuation.

2.	*Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*	☐	☐	☒	☐

Discussion: The use of construction equipment would potentially generate minor vibration in the project sites of 171059 (DAV 022) and 161252 (DAV 252). The nearest residential property is located at approximately 100 feet and 200 feet from these site, respectively. Due to this distance, none of the area residences would experience significant groundborne vibration or groundborne noise levels during construction activities associated with the proposed project. Therefore, Impacts would be less than significant

3.	*A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*	☐	☐	☐	☒

Discussion: The proposed project would not result in a permanent increase in the ambient noise level. No impacts are anticipated.

4.	*A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*	☐	☐	☐	☒

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

Discussion: See discussion under L-1 above. Noise generated during project construction would increase the ambient noise levels in adjacent areas. Construction would be temporary, however, and given the limited duration of this impact it is considered to be less than significant with the incorporation of mitigation measures.

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?*	☐	☐	☐	☒

Discussion: The proposed project is not within two miles of any airport. Therefore, the proposed project would not expose people residing or working in the project area. No impact is anticipated.

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?*	☐	☐	☐	☒

Discussion: The proposed project is not within two miles of a private airstrip. Therefore, the proposed project would not expose people residing or working in the project area. No impact is anticipated.

M. 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)?*	☐	☐	☐	☒

Discussion: The proposed project would not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. No impact would occur.

2.	*Displace substantial numbers of existing housing, necessitating the construction of*	☐	☐	☐	☒

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

replacement housing elsewhere?

Discussion: The proposed project would not displace any existing housing. No impact would occur.

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

Discussion: The proposed project would not displace any people since the project is intended to provide wireless service. No impact would occur.

N. PUBLIC SERVICES

Would the project:

1.	*Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*				
	a. *Fire protection?*	☐	☐	☐	☒
	b. *Police protection?*	☐	☐	☐	☒
	c. *Schools?*	☐	☐	☐	☒
	d. *Parks?*	☐	☐	☐	☒
	e. *Other public facilities; including the maintenance of roads?*	☐	☐	☐	☒

Discussion (a through e): The project represents negligible increase in the potential need for services. Moreover, the project would meet all of the standards and requirements identified by the local fire agency or California Department of Forestry. No impact is anticipated.

O. 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*	☐	☐	☐	☒

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

facility would occur or be accelerated?

Discussion: The proposed project would not entail any use of existing neighborhood and regional parks or other recreational facilities. No impact anticipated.

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?*	☐	☐	☐	☒

Discussion: The proposed project does not propose the expansion or construction of additional recreational facilities. No impact would occur.

P. 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?*	☐	☐	☐	☒

Discussion: There would be no impact because no additional traffic would be generated other than negligible traffic activity from construction vehicles during a short construction window. No impact anticipated.

2.	*Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*	☐	☐	☐	☒

Discussion: In 2000, at the request of the Santa Cruz County Regional Transportation Commission (SCCRTC), the County of Santa Cruz and other local jurisdictions exercised the option to be exempt from preparation and implementation of a Congestion Management Plan (CMP) per Assembly Bill 2419. As a result, the County of Santa Cruz no longer has a Congestion Management Agency or CMP. The CMP statutes were initially established to create a tool for managing and reducing congestion; however, revisions to those statutes

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

progressively eroded the effectiveness of the CMP. There is also duplication between the CMP and other transportation documents such as the Regional Transportation Plan (RTP) and the Regional Transportation Improvement Program (RTIP). In addition, the goals of the CMP may be carried out through the Regional Transportation Improvement Program and the Regional Transportation Plan. Any functions of the CMP which are useful, desirable and do not already exist in other documents may be incorporated into those documents.

The proposed project would not conflict with either the goals and/or policies of the RTP or with monitoring the delivery of state and federally-funded projects outlined in the RTIP. No impact would occur.

3.	*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?*	☐	☐	☐	☒

Discussion: No change in air traffic patterns would result from project implementation. Therefore, no impact is anticipated.

4.	*Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*	☐	☐	☐	☒

Discussion: The project may require lane closures on Highway 1. A Caltrans Encroachment Permit including a Traffic Management Plan will be required prior to building permit issuance. No increase in hazards would occur from project design or from incompatible uses. No impact would occur from project implementation.

5.	*Result in inadequate emergency access?*	☐	☐	☒	☐

Discussion: The project's road access meets County standards.

A temporary lane closure may be required for short periods of time during project construction. However, the proposed project would not restrict emergency access for police, fire, or other emergency vehicles. Impacts would be less than significant from project implementation.

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?*	☐	☐	☐	☒

Discussion: The proposed project design would comply with current road requirements to

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

prevent potential hazards to motorists, bicyclists, and/or pedestrians. No impact would occur.

Q. TRIBAL CULTURAL RESOURCES

1.	*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*				
	A. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources Code section 5020.1(k), or*	☐	☐	☐	☒
	B. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*	☐	☐	☐	☒

Discussion: The project proposes to establish co-located cell sites at six locations and a new site at one location. According to the archeological report (Attachment 6) no Tribal Cultural Resources are known to occur in or near the project area. Therefore, no impact to the significance of a Tribal Cultural Resource is anticipated from project implementation.

R. UTILITIES AND SERVICE SYSTEMS

Would the project:

1.	*Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*	☐	☐	☐	☐

Discussion: The proposed project would not generate wastewater. Therefore, wastewater

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

treatment requirements would not be exceeded. No impacts would occur.

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?*	☐	☐	☐	☐

Discussion:

The proposed project would not require water or wastewater treatment. No impacts are expected to occur.

3.	*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?*	☐	☐	☐	☒

Discussion: The proposed project would not generate increased runoff. The vault at 161252 (DAV 020) would require intermittent pump out by an embedded sump pump, generating an insignificant quantity of runoff. The project would not result in the need for new or expanded drainage facilities. No impact would occur.

4.	*Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*	☐	☐	☐	☒

Discussion: The proposed project would only use small amounts of water during construction for dust control and concrete work. No water use would be required during the operational phase of the project other than any water possibly required to establish self-sufficient, summer dry vegetation. No impacts are expected to occur from project implementation.

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?*	☐	☐	☐	☒

Discussion: The proposed project would only use small amounts of water during construction for dust control and concrete work. No wastewater would be generated. No water use would be required during the operational phase of the project. No impacts are expected to occur from project implementation.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
6. *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*	☐	☐	☐	☒

Discussion: The proposed would not generate solid waste during the operational phase of the project. However, construction debris would be generated during demolition and construction, much of which would be recycled. No impact is anticipated.

7. *Comply with federal, state, and local statutes and regulations related to solid waste?*	☐	☐	☐	☒

Discussion: The project would comply with all federal, state, and local statutes and regulations related to solid waste disposal. No impact would occur.

S. MANDATORY FINDINGS OF SIGNIFICANCE

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?*	☐	☒	☐	☐

Discussion: 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 or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in Section III (A through Q) of this Initial Study. Resources that have been evaluated as significant would be potentially impacted by the project, particularly special status species and native plant communities described above. However, mitigation has been included that clearly reduces these effects to a level below significance. Required measures include avoidance and mitigation of species and habitat, pre-construction surveys, protection of designated plants, nesting avoidance and protocols, and red-legged frog protection. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of

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

Significance.

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)?*	☐	☒	☐	☐

Discussion: In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant effects related to special status wildlife and plant communities, which would also be cumulatively significant over the seven cell sites. However, mitigation has been included that clearly reduces these cumulative effects to a level below significance. This mitigation includes measures to reduce these impacts to a less than significant level. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

3. *Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?*	☐	☒	☐	☐

Discussion: : In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to specific questions in Section III (A through Q). As a result of this evaluation, there were determined to be potentially significant effects to human beings related to potential visual impacts and impacts to cultural resources. However, mitigation has been included that clearly reduces these effects to a level below significance. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

IV. REFERENCES USED IN THE COMPLETION OF THIS INITIAL STUDY

BCR Consulting, LLC, 2017
Cultural Resources Assessment for the Davenport Gap Node Project

California Department of Conservation. 1980
Farmland Mapping and Monitoring Program Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance Santa Cruz County U.S. Department of Agriculture, Natural Resources Conservation Service, soil surveys for Santa Cruz County, California, August 1980.

County of Santa Cruz, 2013
County of Santa Cruz Climate Action Strategy. Approved by the Board of Supervisors on February 26, 2013.

County of Santa Cruz, 2015
County of Santa Cruz Local Hazard Mitigation Plan 2015-2020. Prepared by the County of Santa Cruz Office of Emergency Services.

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

MBUAPCD, 2008
Monterey Bay Unified Air Pollution Control District (MBUAPCD), CEQA Air Quality Guidelines. Prepared by the MBUAPCD, Adopted October 1995, Revised: February 1997, August 1998, December 1999, September 2000, September 2002, June 2004 and February 2008.

MBUAPCD, 2013a
Monterey Bay Unified Air Pollution Control District, NCCAB (NCCAB) Area Designations and Attainment Status – January 2013. Available online at http://www.mbuapcd.org/mbuapcd/pdf/Planning/Attainment_Status_January_2013_2.pdf

MBUAPCD, 2013b
Triennial Plan Revision 2009-2011. Monterey Bay Air Pollution Control District. Adopted April 17, 2013.

Synthesis Planning, August, 2017
Biological Assessment, Davenport Gap Telecommunications Project

Trileaf, 2017
Section 106 Report [Davenport Gap Telecommunications Project]

Attachment 1

Mitigation Monitoring and Reporting Program

This page intentially left blank.

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

MITIGATION MONITORING AND REPORTING PROGRAM
for
Davenport Gap Project
Application Nos. 161248-161253; 171059
September 25, 2017

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
Biological Resources					
BIO-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 Wildlife, or U.S. Fish and Wildlife Service?*	**Avoid Minimize Potential Impacts to California Red-legged Frog.** The following measures shall be implemented at project sites DAV-016, DAV-017, DAV-018 and DAV-019 to avoid and minimize potential impacts to the California red-legged frog. Avoidance measures presented in the *Programmatic Biological Opinion* (USFWS 1999), and as developed by the County of Santa Cruz, will be adopted and implemented to prevent mortality of individuals during all construction activities and removal of Pampas grass and other invasive vegetation. a. The applicant or project proponent shall submit the name(s) and credentials of qualified biologist to USFWS (Service) at least 15 days prior to the onset of activities. The applicant or project proponent shall submit the name(s) and credentials of biologists who would conduct activities specified in the following measures. No project activities shall begin until proponents have received written approval from the Service that the biologist(s) is qualified to conduct the work. b. A Service-approved biologist shall survey the work site no more than 48 hours before the onset of any earth-moving activity, construction, or vegetation removal within project sites DAV-016 and DAV-019, whichever comes first. The preconstruction survey shall include two nights of nocturnal surveys in areas of suitable habitat. c. If any CRF are encountered during the surveys, all work in the work area shall be suspended while the findings are reported to the CDFW and USFWS and it is determined what, if any, further actions must be followed to prevent possible take of this species. If any red-legged frogs are required to be moved or relocated, only Service-approved biologists shall participate in activities associated with the capture, handling, and moving of California red-legged frogs. d. Before any activities begin on a project, a Service-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the California red-legged frog and its habitat, the importance of the California red-legged frog and its habitat, general measures that are being implemented to conserve the California red-legged frog as they relate to the project, and the boundaries within which the project may be accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions. All workers will be advised that equipment and vehicles must remain within	Applicant	Compliance monitored by the County Planning Department, USFWS and approved biologist.	To be implemented prior to and during project construction

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		the fenced work area. e. Where construction will occur in CRF habitat where CRF are potentially present, off-road work areas (defined as including, but not necessarily limited to, construction and staging areas) will be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat areas. A qualified biologist will assist in determining the boundaries of the area to be fenced in consultation with the Santa Cruz County, USFWS, and CDFW. f. The authorized biologist will direct the installation of the fence and will conduct biological surveys to move any individuals of these species from within the fenced area to suitable habitat outside of the fence. g. Exclusion fencing shall be at least 24 inches in height. The type of fencing must be approved by the authorized biologist, the USFWS, and CDFW. The fence shall be permanent enough to ensure that it remains in good condition throughout the duration of the construction project on the project site. The fence shall be installed prior to any site grading or other construction-related activities are implemented. The fence shall remain in place during all site grading or other construction-related activities. The California red-legged frog exclusion fence can be "silt fence" that is buried along the bottom edge. h. If at any individuals of these species are found within an area that has been fenced to exclude these species, activities will cease until the authorized biologist moves the individuals. i. If any of these species are found in a construction area where fencing was deemed unnecessary, work will cease until the authorized biologist moves the individuals. The authorized biologist in consultation with USFWS and CDFW will then determine whether additional surveys or fencing are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist j. Any individuals found during clearance surveys or otherwise removed from work areas will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. k. Clearance surveys shall occur on a daily basis in the work area. l. The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed. m. To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times. n. A Service-approved biologist shall be present at the work site until such time as all removal of California red-legged frogs, instruction of workers, and habitat disturbance have been completed. After this time, the contractor or permittee shall designate a person to monitor on-site compliance with all minimization measures. The Service-approved			

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		biologist shall ensure that this individual receives training outlined in measure 3 above and in the identification of California red-legged frogs. The monitor and the Service-approved biologist shall have the authority to halt any action that might result in impacts that exceed the levels anticipated during review of the proposed action. If work is stopped, Service shall be notified immediately by the Service-approved biologist or on-site biological monitor. o. The number of access routes, number and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly demarcated, and these areas shall be outside of riparian and wetland areas. Where impacts occur in these staging areas and access routes, restoration shall occur as identified by BIO-1 herein. p. Work activities shall be completed between April 1 and November 1. Should the proponent or applicant demonstrate a need to conduct activities outside this period, the USFWS may authorize such activities. Project activities shall be limited to daylight hours, except during an emergency, in order to avoid nighttime activities when CRF frogs may be present. q. Traffic speed should be maintained at 20 miles per hour or less in the work area. r. As consistent with the native landscape screening required by the site plan for DAV 016 (Application 161248), and the Coastal scrub revegetation and possible relocation requirements provided by *BIO-4,* project sites DAV-016 and DAV-019 shall be revegetated with an appropriate assemblage of native upland vegetation suitable for the area. A species list and restoration and monitoring plan shall be included with the project proposal for review and approval by County prior to building permit issuance for these sites. Such a plan must include, but not be limited to, location of the restoration, species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not met.			
BIO-2A		**Avoid and Minimize Potential Impacts to Special Status Avian Species** (See BIO-2B for Mitigation and Monitoring Measures for Burrowing Owl.) The following measures shall be implemented at the project sites or buffer areas of all project sites with the exception of the DAV-022m2, to avoid and minimize potential impacts to nesting Cooper's hawk, California yellow warbler, white-tailed kite, Pacific coast flycatcher, loggerhead shrike) should they become established within the proposed project site or buffer area prior to project implementation. a. If ground disturbing activities occur during the breeding season of migratory avian or raptor species (February through mid-September), surveys for active nests will be conducted by a qualified biologist no more than 10 days prior to start of activities. Pre-construction nesting surveys shall be conducted for nesting migratory avian and raptor species in the project site and buffer area. Pre-construction biological surveys shall	Applicant	Compliance monitored by the County Planning Department and approved biologist.	To be implemented prior to and during project construction

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		occur prior to the proposed project implementation, and during the appropriate survey periods for nesting activities for individual avian species. Surveys will follow required CDFW and USFWS protocols, where applicable. A qualified biologist will survey suitable habitat for the presence of these species. If a migratory avian or raptor species is observed and suspected to be nesting, a buffer area will be established to avoid impacts to the active nest site. Identified nests should be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed and no further mitigation measures will be required. If active nesting sites are found, the following exclusion buffers will be established, and no project activities will occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest or parental care for survival: i. Minimum no disturbance of 250 feet around active nest of non-listed bird species and 250 foot no disturbance buffer around migratory birds; ii. Minimum no disturbance of 500 feet around active nest of non-listed raptor species; iii. Minimum 0.5-mile no disturbance buffer from listed species and fully protected species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. iv. Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change should cease and the appropriate regulatory agencies (i.e. CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures. v. A variance from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and is recommended that CDFW and USFWS be notified in advance of implementation of a no disturbance buffer variance.			
BIO-2B		**Avoid and Minimize Potential Impacts to Burrowing Owls.** The following measures included in the CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) shall be implemented by the biotic consultant for proposed project sites DAV-016m3, DAV-017, DAV-019m, and DAV-020m if burrowing owls present. a. If preconstruction surveys determine that burrowing owls are present in the proposed project sites and/or buffer areas, a burrowing owl mitigation plan shall be prepared by a qualified biologist describing recommended site specific shelter-in-place measures, worker training, and/or other measures to ensure that Project construction does not	Applicant	Compliance monitored by the County Planning Department and approved biologist.	To be implemented prior to, during, and following project construction

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		result in adverse impacts to the burrowing owls. b. Occupied burrows shall not be disturbed during the burrowing owl nesting season (February 1 through August 31) unless a qualified biologist approved by the CDFW verifies through non-invasive methods that either: (1) the birds have not begun egg-laying and incubation; or (2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival. c. Burrowing owls present in the project sites or within 500 feet (as identified during preconstruction surveys) shall be moved away from the disturbance area using passive relocation techniques. Prior to commencement of relocation, a management plan shall be prepared and approved by CDFW. Relocation shall be completed between September 1 and January 31 (outside of breeding season). A minimum of one or more weeks is required to relocate the owls and allow them to acclimate to alternate burrows. Passive relocation techniques will follow the CDFG Staff Report on Burrowing Owl Mitigation Guidelines (2012) and include the following measures: i. Install one-way doors in burrow entrances. Leave doors in place for 48 hours to ensure owls have left the burrow. ii. Allow one or more weeks for owls to acclimate to off-site burrows. Daily monitoring shall be required for the passive relocation period. iii. Once owls have relocated off-site, collapse existing burrows to prevent reoccupation. Prior to burrow excavation, flexible plastic pipe shall be inserted into the tunnels to allow escape of any remaining owls during excavation. Excavation shall be conducted by hand whenever possible. iv. Destruction of burrows shall occur only pursuant to a management plan approved by CDFW. v. As an alternative (if approved by CDFW), all occupied burrows identified off-site within 500 feet of construction activities outside of nesting season (September through January) and during nesting season (February 1 through August 31) could be buffered by hay bales, fencing (e.g. sheltering in place) or as directed by a qualified biologist and the CDFWS.			
BIO-3		**Avoid and Minimize Potential Impacts to Bats.** In the event any tree removal is necessary on project site DAV-021m, and to prevent direct mortality of bats roosting in the trees on the project site, a bat habitat assessment must be conducted by a qualified bat biologist that should be conducted 3 to 6 months prior to tree removal. Tree removal must only occur during seasonal periods of bat activity, between March 1, or when evening temperatures are above 45F and rainfall less than 1/2" in 24 hours occurs, and April 15, prior to parturition of pups. The next acceptable period for tree removal with suitable roosting habitat is after pups become self-sufficient – September 1 through about October 15, or prior to evening temperatures dropping below 45F and onset of rainfall fretter than 1/2" in 24 hours.	Applicant	Compliance monitored by the County Planning Department and approved biologist.	To be implemented prior to and during project construction.

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
BIO-4	*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 Wildlife or U.S. Fish and Wildlife Service*	**Avoid and Mitigate Potential Impacts to Coastal Scrub Plant Community.** Implement the following measures at sites DAV O16, DAV 018, DAV 019 and DAV 020 to avoid and mitigate impacts to Coastal Scrub Plant Community. The mitigation measures provided in *BIO-5* to insure that the project is configured to minimize disturbance of Coastal Scrub habitat shall be implemented. a. Consistent with implementation of *BIO-5,* and prior to issuance of a building permit for sites DAV O16, DAV 018, DAV 019 and DAV 020, a qualified biologist will inventory the coyote bush, California sage plants, lizard tail and Seaside daisy (*Erigeron glaucus*) at each site and get an accurate number of plants that are proposed for removal. b. Plans submitted with building permit applications shall include both construction and staging areas, and disturbance envelopes. c. After construction is complete, the biotic consultant will employ or contract an entity qualified in habitat restoration (landscape architect or restoration consultant) to implement a Coastal scrub re-vegetation and restoration plan. d. During all plant restoration activities on subject sites, including planting activities and removal of Pampas grass and other invasive plants, the red-legged frog avoidance and mitigation measures provided in BIO-1 shall be implemented. e. Plantings shall be based on a planting plan (include species, number, location and tank location and dimensions) submitted to the County for approval prior to building permit issuance. Two times the number of plants removed shall be planted f. The restoration contractor shall include a recommendation on the feasibility of transplanting *Dudlea palmerii* from disturbance envelope. *D. palmerii* is not a sensitive species but part of the Coastal scrub community. g. The contractor will prepare the soil for planting. The plants will be planted in the prepared soils, and mulch will be placed around the plants to maintain moisture. A system of irrigation lines will be laid through the revegetation area, and will be hooked up to an irrigation water tank. The contractor will refill the water tank on a regular basis during the non-rainy season of the year. No watering will be required during the rainy season. The biotic consultant will establish a regular yearly schedule with the contractor and the Santa Cruz County Planning Department to conduct site visits to assess the revegetation efforts. h. Planting shall utilize plant propagules collected from Santa Cruz County, obtained from native plant nurseries that employ Best Management Practices (BMP's) that control or eliminate the diseases caused by *Phytopthora ramorum*, as outlined by the California Oak Mortality Task Force. i. If during the site visits it is determined that individual plants are dying or dead, they may need to be replaced by the contractor. Yearly visits and replantings shall occur until the replanted bushes have re-established successfully.	Applicant	Compliance monitored by the County Planning Department and approved biologist.	To be implemented prior to, during, and following project construction.

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		j. Maintain 80% survival of installed stock in Years 1-3. Install replacement plants as needed to meet survival rates. If substantial replanting is necessary, the maintenance and monitoring period may need to be extended so that each site is maintained and monitored for 5 years. k. Maintain and monitor the site annually for to insure success criteria have been met. Submit annual reports to County Planning Department by December 31 of each monitoring year. l. The biotic consultant shall remove non-native invasive Pampas grass populations from the DAV-018 and DAV-019m project sites and surrounding buffer areas. m. The biotic consultant shall hire an invasive weed consultant that is experienced in the removal of invasive noxious weeds, including Pampas grass. n. The consultant will remove all Pampas grass from the sites using hand tools, shovels, and other mechanical means to remove all root systems and above ground portions of the plants. No herbicides shall be used at removal sites. The consultant will then then stabilize the soils at the areas of removal and revegetate the disturbed soils with native species. The biotic consultant will establish a schedule with the consultant to revisit the site once a year to remove any additional Pampas grass and reapply chemical controls. The biotic consultant will correspond with Santa Cruz County Planning Department to coordinate this schedule. The biotic consultant will continue the annual visits until the Pampas grass does not regrow for three years. o. Invasive weeds shall be controlled at the construction site for the first three years after construction to less than 5% each year. Invasive species shall be characterized as those designated by Water Use Classifications of Landscape Species (WUCOLS III). p. Consultant shall remove all invasive vegetation from the sites using hand tools, shovels, and other mechanical means to remove all root systems and above ground portions of the plants. No herbicides shall be used at removal sites. The consultant will then stabilize the soils at the areas of removal so that native vegetative species can re-establish. The biotic consultant will establish a schedule with the consultant to revisit the site once a year to remove any additional invasive plants. The biotic consultant will correspond with Santa Cruz County Planning Department to coordinate this schedule. The biotic consultant will continue the annual visits for three years.			
BIO-5	*Interfere substantially with the movement of any native resident or migratory fish or wildlife species or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*	**Avoid and Minimize Interference with Red-legged Frog Movement** Where erosion, sediment and drainage control is installed, it shall be configured as provided in *BIO-1* to avoid and mitigate potential CRF movement into site construction zones. Biologic site monitor will be required to prevent CRF from entering construction zone and will use safe methods as described in *BIO-1* as applicable to guide or transfer CRF around construction zones. These measures, combined with mitigation measures *BIO 1-5* will reduce potential impacts to a level of less than significant.	Applicant	Compliance monitored by the County Planning Department and approved biologist.	To be implemented prior to and during project construction.

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
BIO-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)?*	**Minimize Land-Clearing of Coastal Scrub Community.** At project sites DAV-016, DAV-018, DAV-019 and DAV-020 the conditions of approval shall include the requirements established by **SCCC § 16.32.090 Approval conditions**. In addition, the following mitigation and monitoring measures would be implemented. 1) Disturbance and removal of coastal scrub habitat shall be minimized to the greatest extent technically feasible without violating scenic protection policies and findings. 2) Prior to building permit issuance, the following measures will be implemented: a. The applicant shall stake the permanent and temporary disturbance envelopes (including, but not necessarily limited to, construction and staging areas) and tag with orange survey ribbons the Coastal scrub bushes targeted for removal, based on the site plans attached to this Initial Study. b. The applicant shall meet with County staff for a pre-construction review at sites DAV 016, DAV 018, DAV 019 and DAV 020 for a discussion of potential project modifications to minimize disturbance of Coastal scrub habitat. c. Following the site inspection, the applicant shall provide a site plan revised as necessary for compliant disturbance, including construction areas, staging areas and areas for temporary storage of excavated materials. d. Prior to construction, the applicant shall install protective fencing around bushes and other sensitive Coastal scrub areas to be maintained adjacent to the construction envelope.	Applicant	Compliance monitored by the County Planning Department and qualified biologist.	To be implemented prior to and during project construction.
Cultural Resources					
ARCH-1	*Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*	The following mitigation measures shall be implemented at project site DAV-022. Pursuant to Section 16.40.040 of the Santa Cruz County Code, archaeological monitoring shall be required for any excavation associated with this project site. If at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible persons shall immediately cease and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full archeological report shall be prepared and representatives of the local Native California tribal 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.	Applicant	Compliance monitored by the County Planning Department and qualified archeologist.	To be implemented prior to and during project construction.
ARCH-2	*Disturb any human remains, including those interred outside of dedicated cemeteries?*	Pursuant to Section 16.40.040 of the Santa Cruz County Code, and consistent with State Health and Safety Code §7050.5 and Public Resources Code Section 5097.98, if at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains are discovered, the responsible persons shall immediately cease	Applicant	Compliance monitored by the County Planning Department and qualified	To be implemented prior to and during project construction.

No.	Environmental Impact	Mitigation Measures	Responsibility for Compliance	Method of Compliance	Timing of Compliance
		and desist from all further site excavation and notify the sheriff-coroner and the Planning Director. If the coroner determines that the remains are not of recent origin, a full 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.		archeologist.	
Noise					
NOI-1	*Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies*	Limit construction activity to between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. Saturday in order to avoid noise during more sensitive nighttime hours. Prohibit construction activity on Sundays.	Applicant	Compliance monitored by the County Planning Department and applicant.	To be implemented prior to and during project construction.
NOI-2		Require that all construction and maintenance equipment powered by gasoline or diesel engines have sound-control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.			
NOI-3		Prohibit gasoline or diesel engines from having unmuffled exhaust.			
NOI-4		Use noise-reducing enclosures around stationary noise-generating equipment capable of 6 dB attenuation			

Attachment 2

APPLICATIONS 161248-161253; 171059
(DAV 016-DAV 023)
Wireless Service Gap – Davenport Gap

This page intentially left blank.

Attachment 2

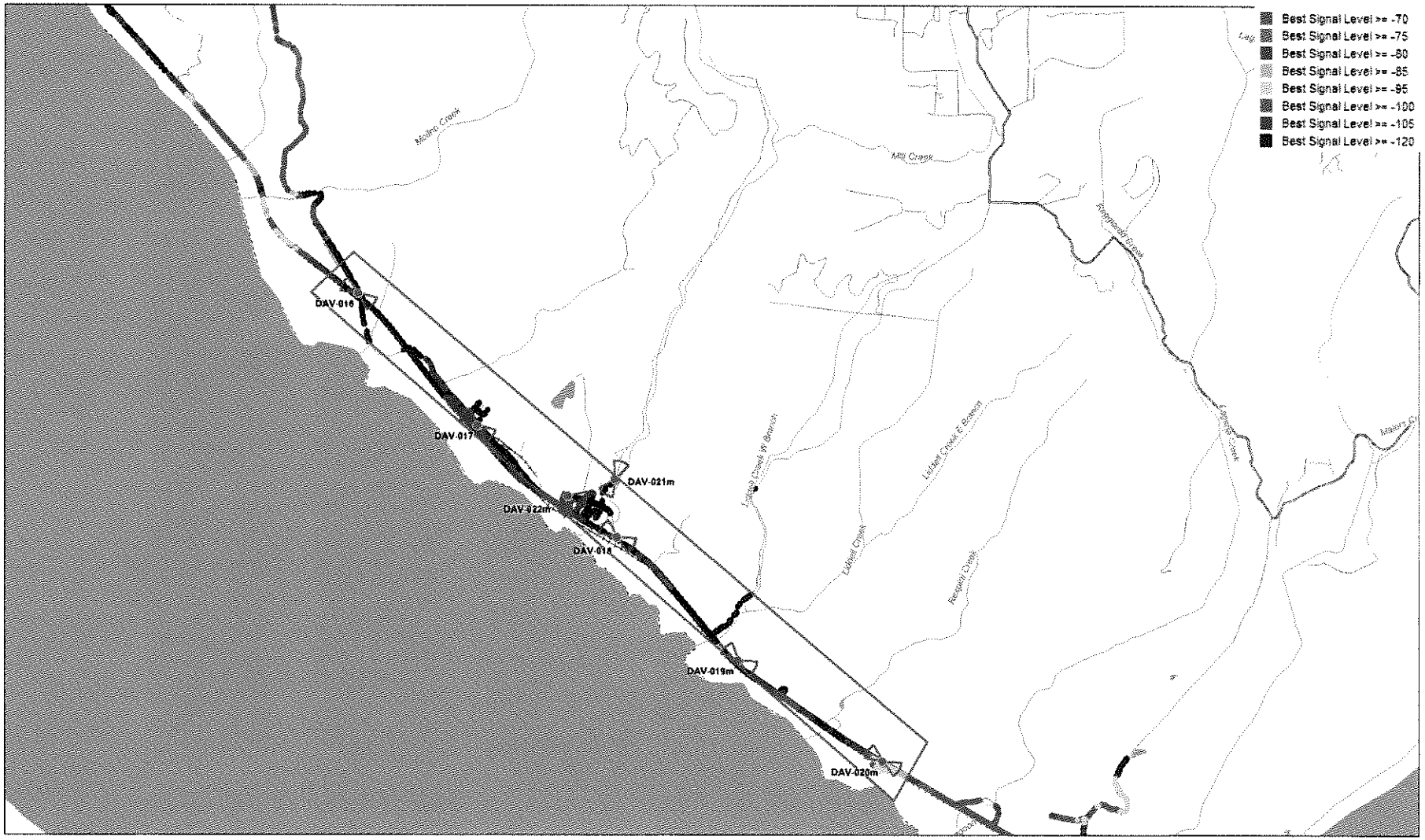
DAVENPORT GAP

Page 1 – No Coverage

Page 2 – Project Signal Distribution

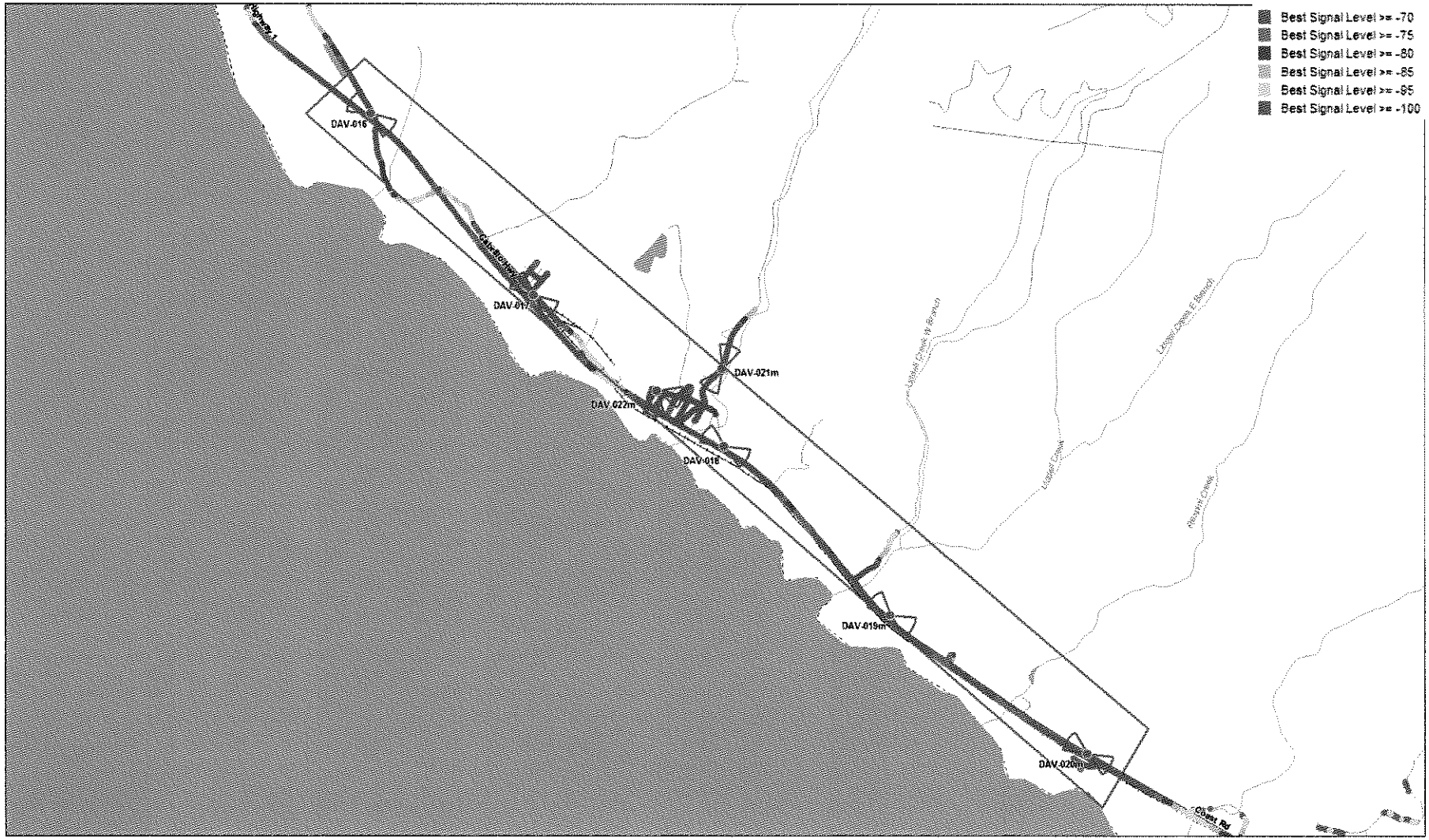
700 LTE Benchmark – Currently No Coverage

RSRP - dBm



CW Results - 7 Nodes Composite

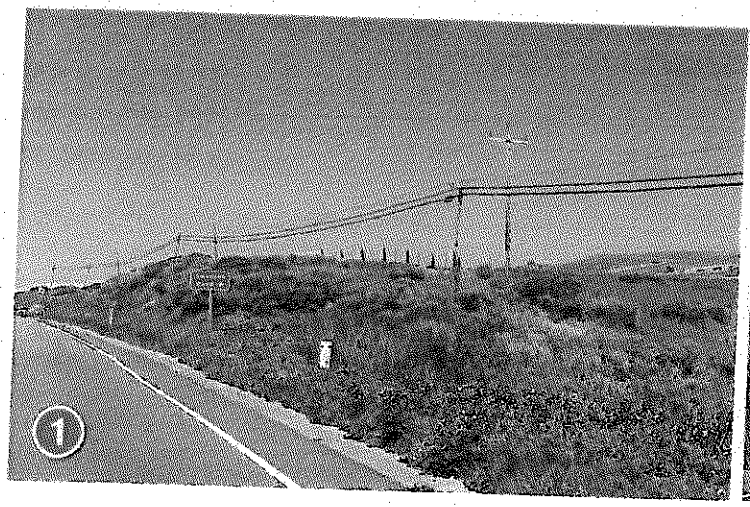
700 MHz Band – RSRP dBm

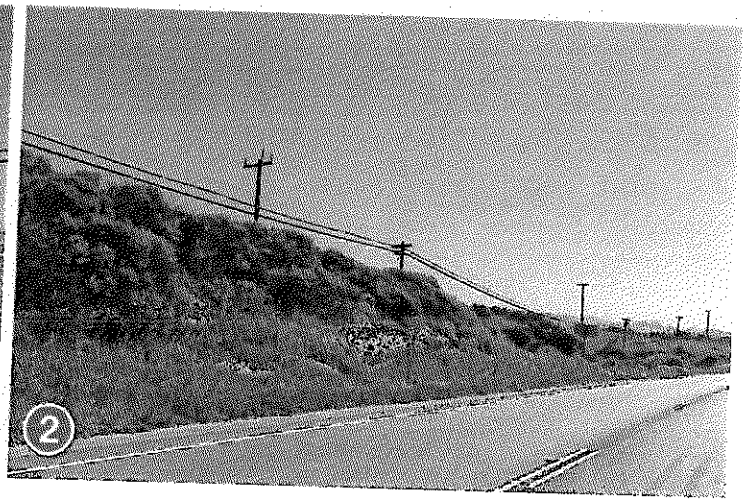


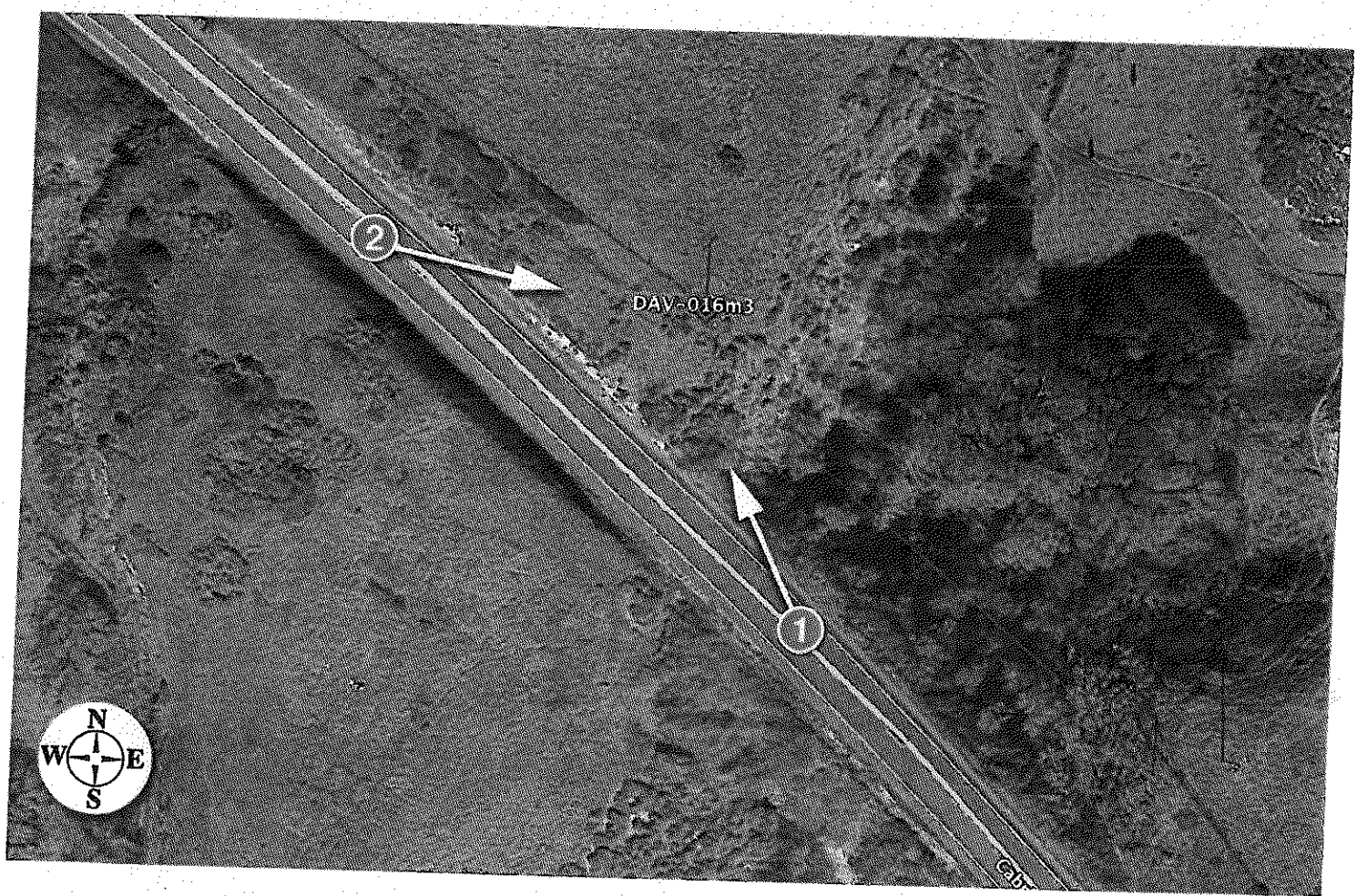
Attachment 3

APPLICATIONS 161248-161253; 171059
(DAV 016-DAV 023)
Visual Simulations of Preferred Alternatives

This page intentially left blank.







CROWN CASTLE

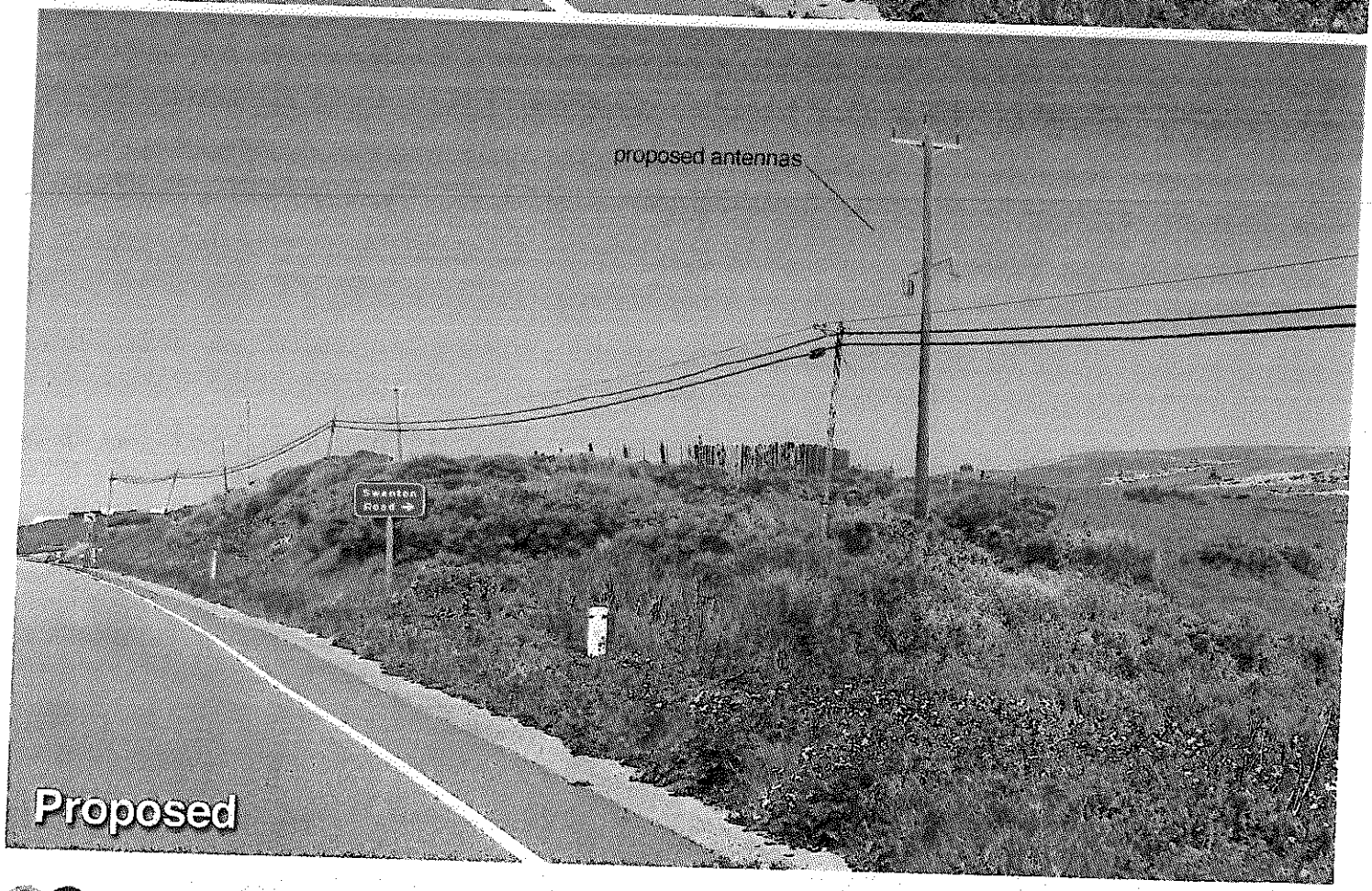
DAV-016m3 with equipment behind fence

Aerial Map

7/27/17

Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

Applied Imagination 510 914-0500



CROWN CASTLE

DAV-016m3 Equipment Behind Fence Option

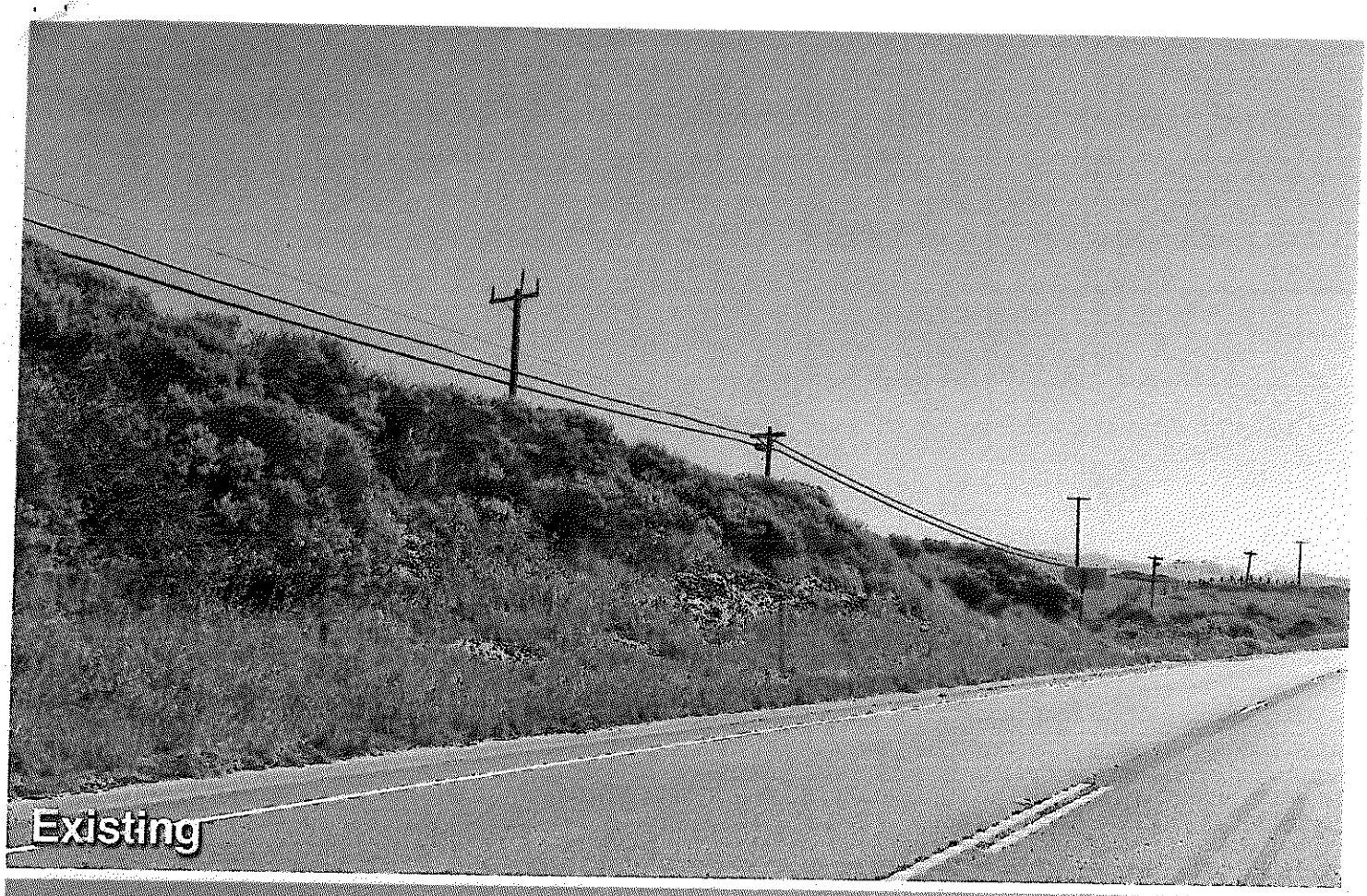
Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

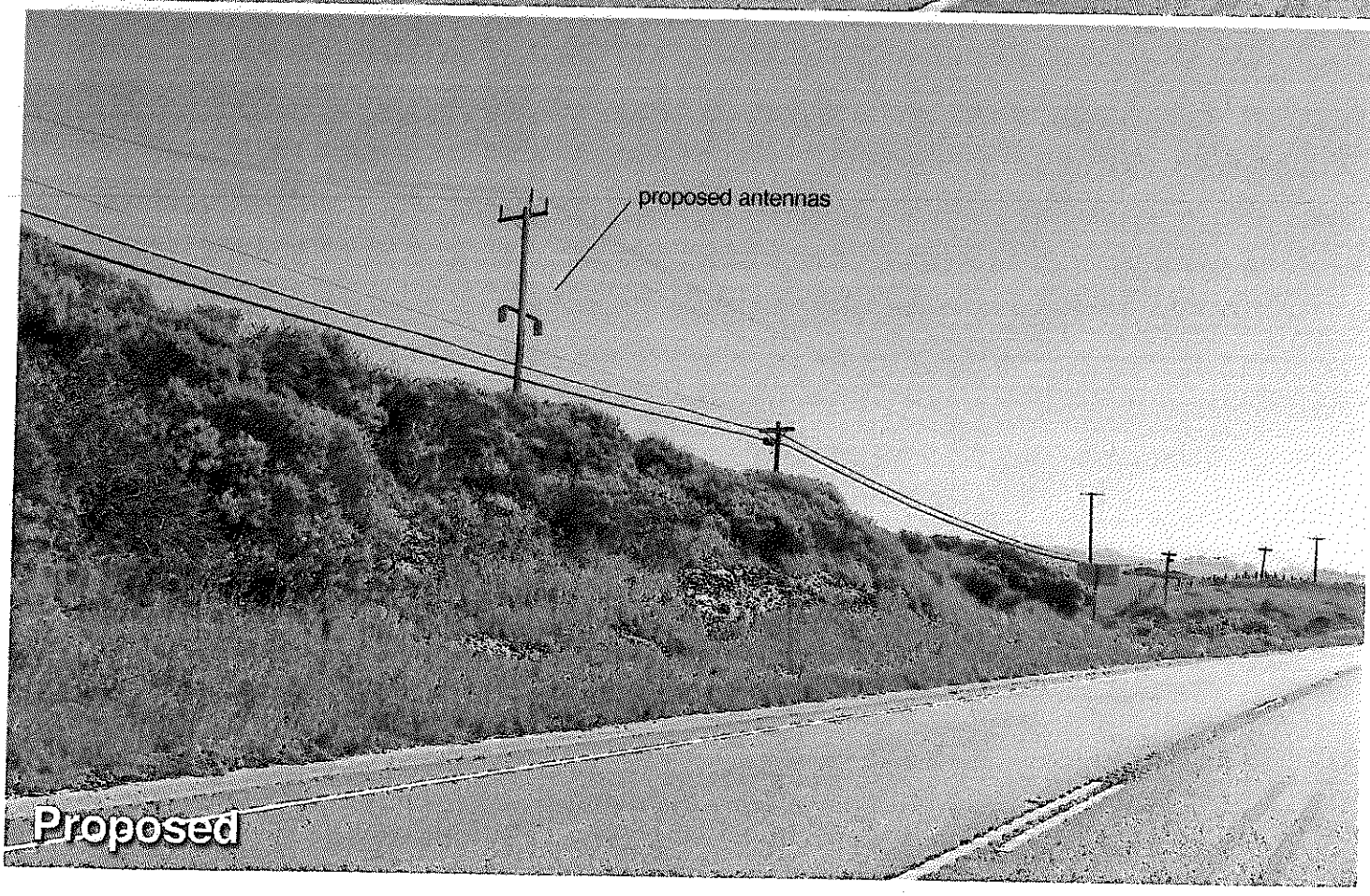
Looking Northwest from Hwy 1

9/16/17

View #1

Applied Imagination 510 914-0500





CROWN CASTLE

DAV-016m3 Equipment Behind Fence Option

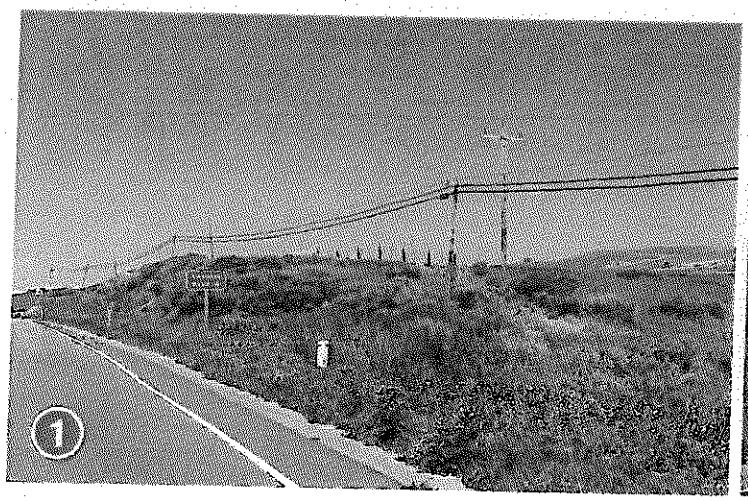
Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

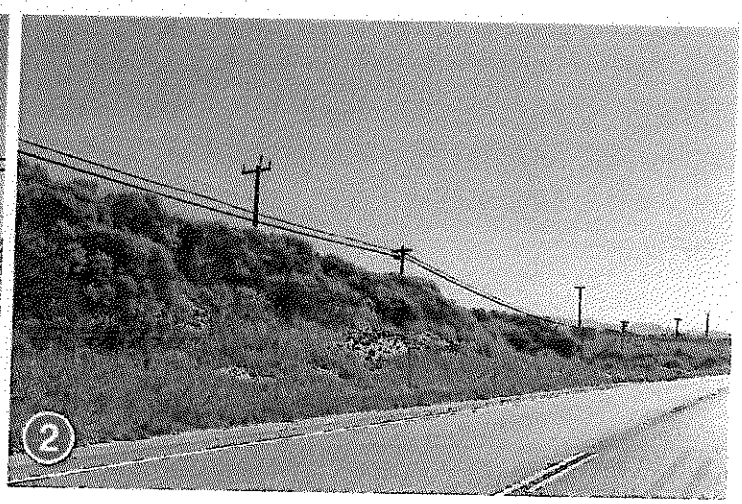
Looking Southeast from Hwy 1

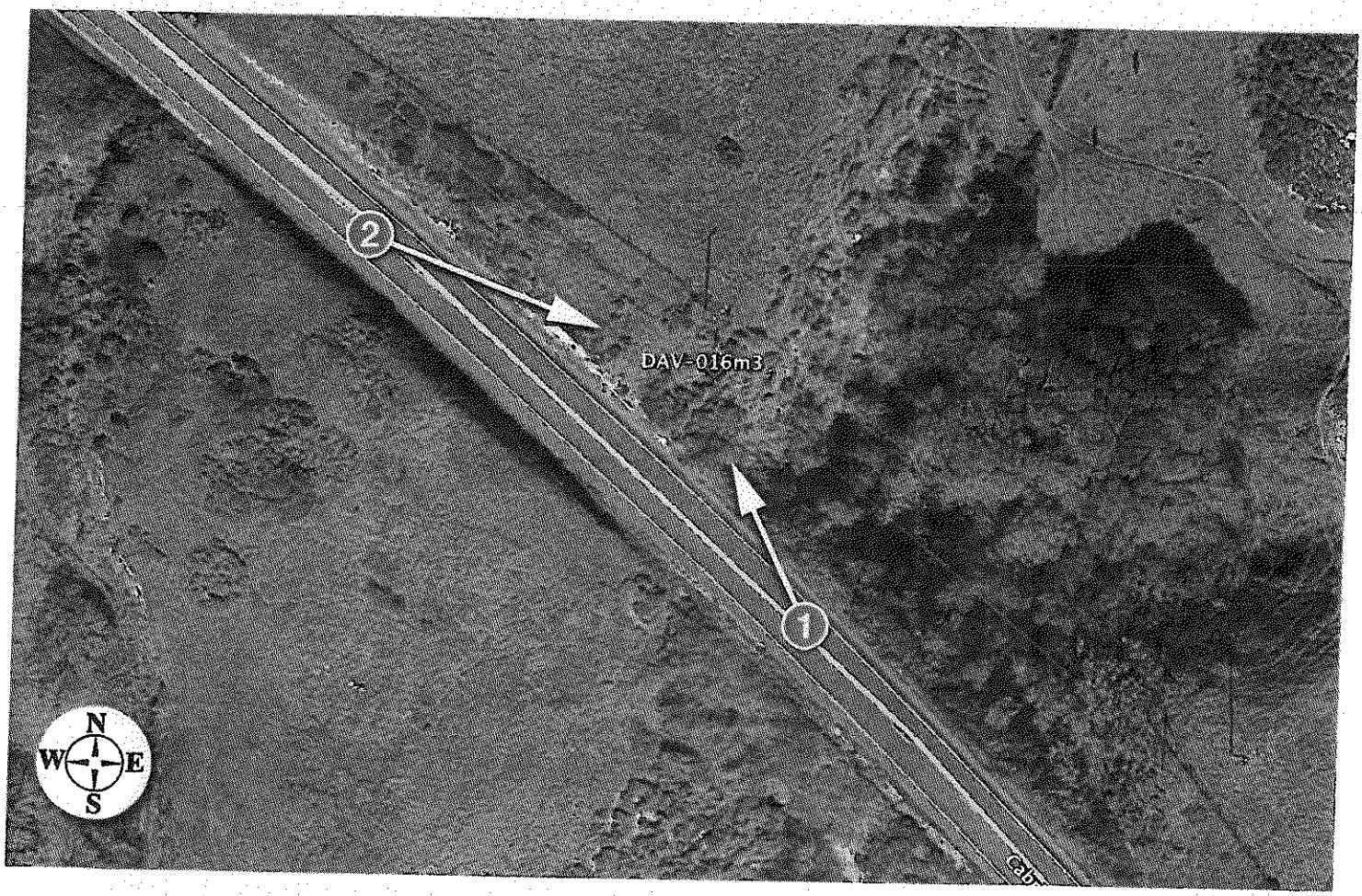
View #2

9/16/17

Applied Imagination 510 914-0500







CROWN CASTLE

DAV-016m3 Pole Mounted Option

Aerial Map

9/16/17

Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

Applied Imagination 510 914-0500

CROWN CASTLE

DAV-016m3 Pole Mounted Option

Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

Looking Northwest from Hwy 1

View #1

9/16/17

Applied Imagination 510 914-0500

CROWN CASTLE

DAV-016m3 Pole Mounted Option

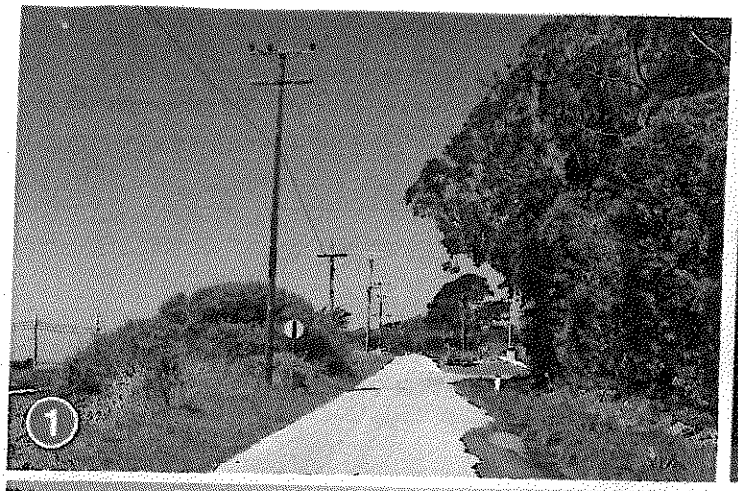
Southeast of Hwy 1 / Davenport Landing Road
Davenport, CA

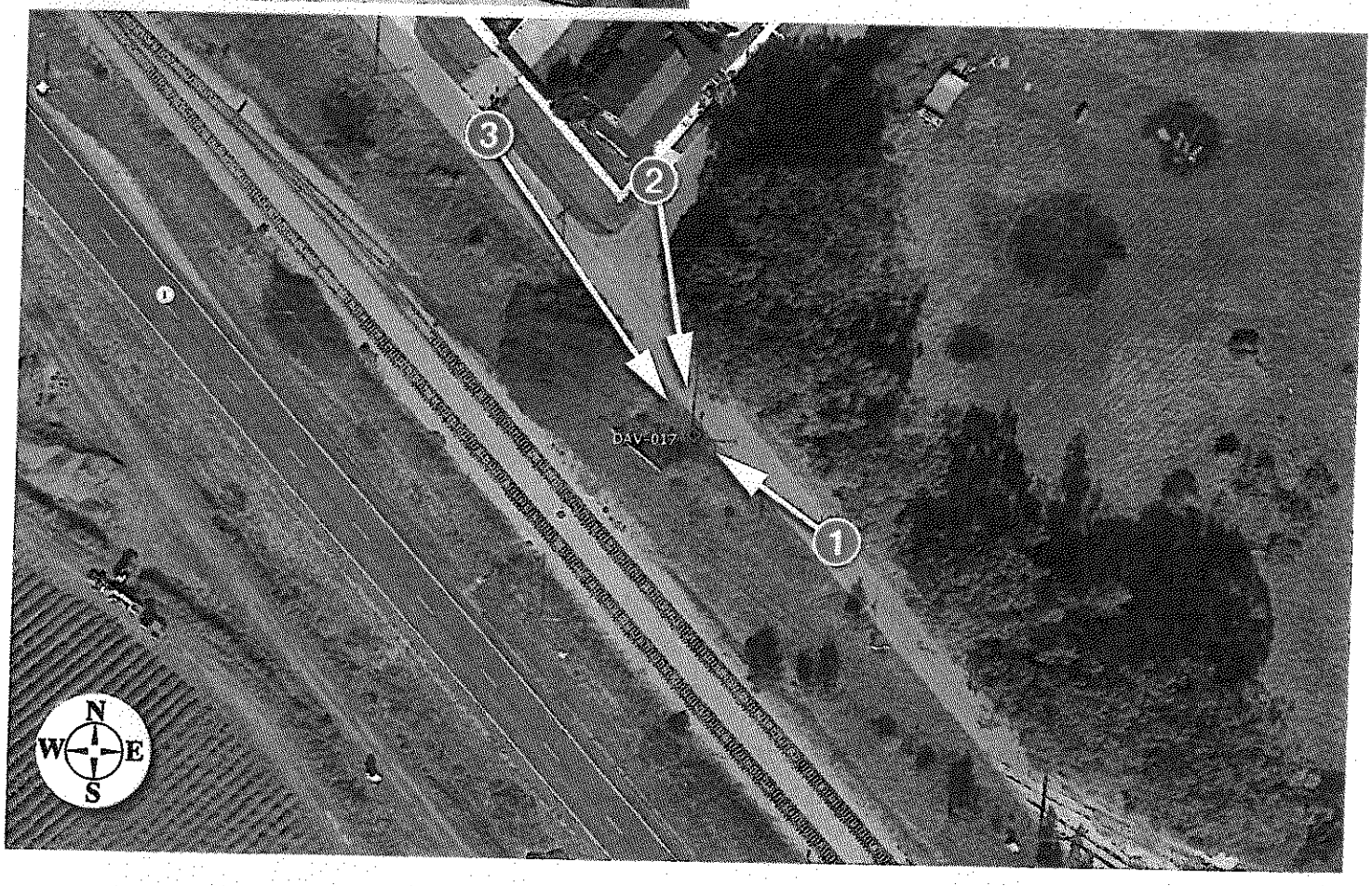
Looking Southeast from Hwy 1

View #2

9/16/17

Applied Imagination 510 914-0500





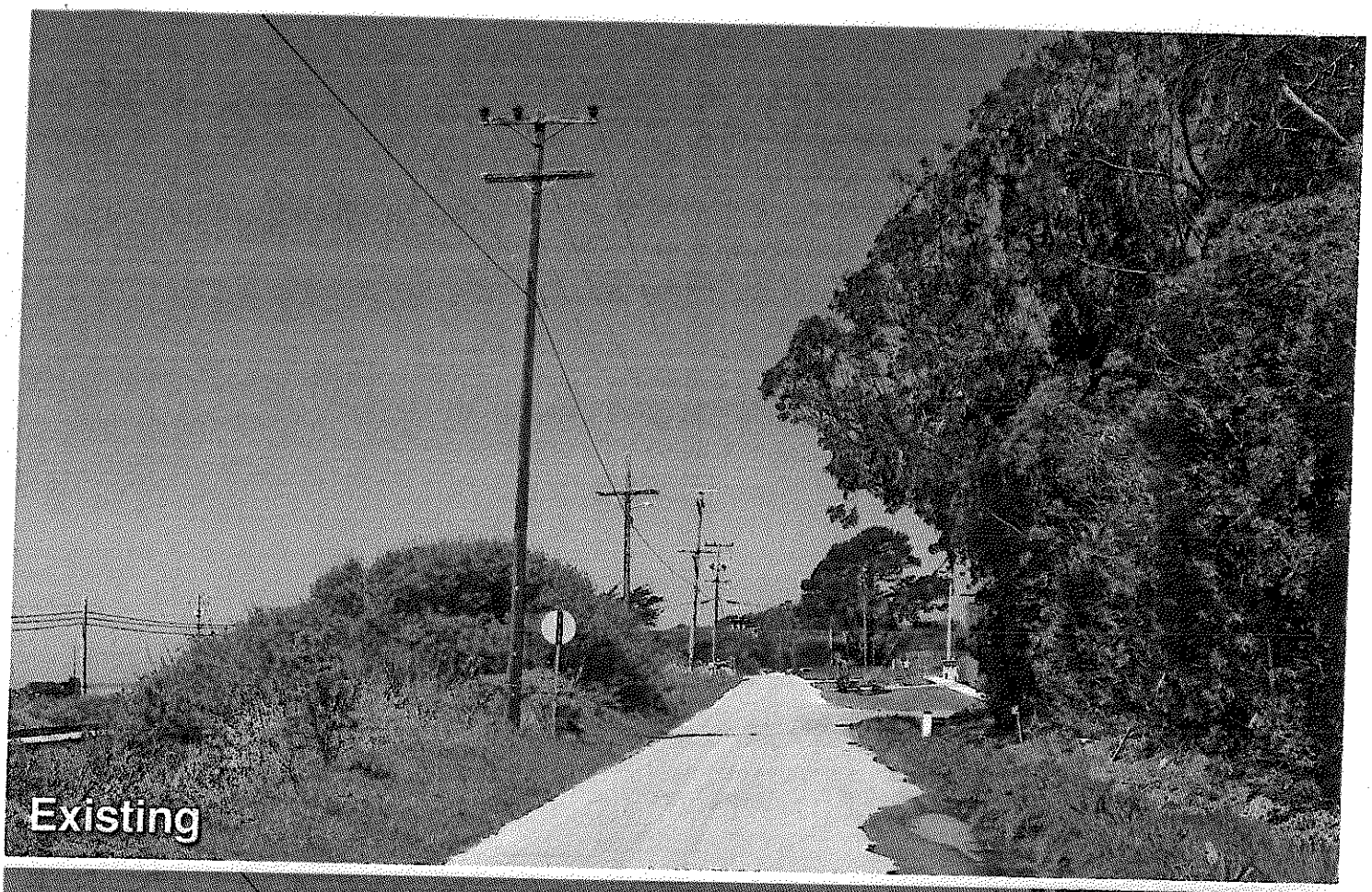
CROWN CASTLE

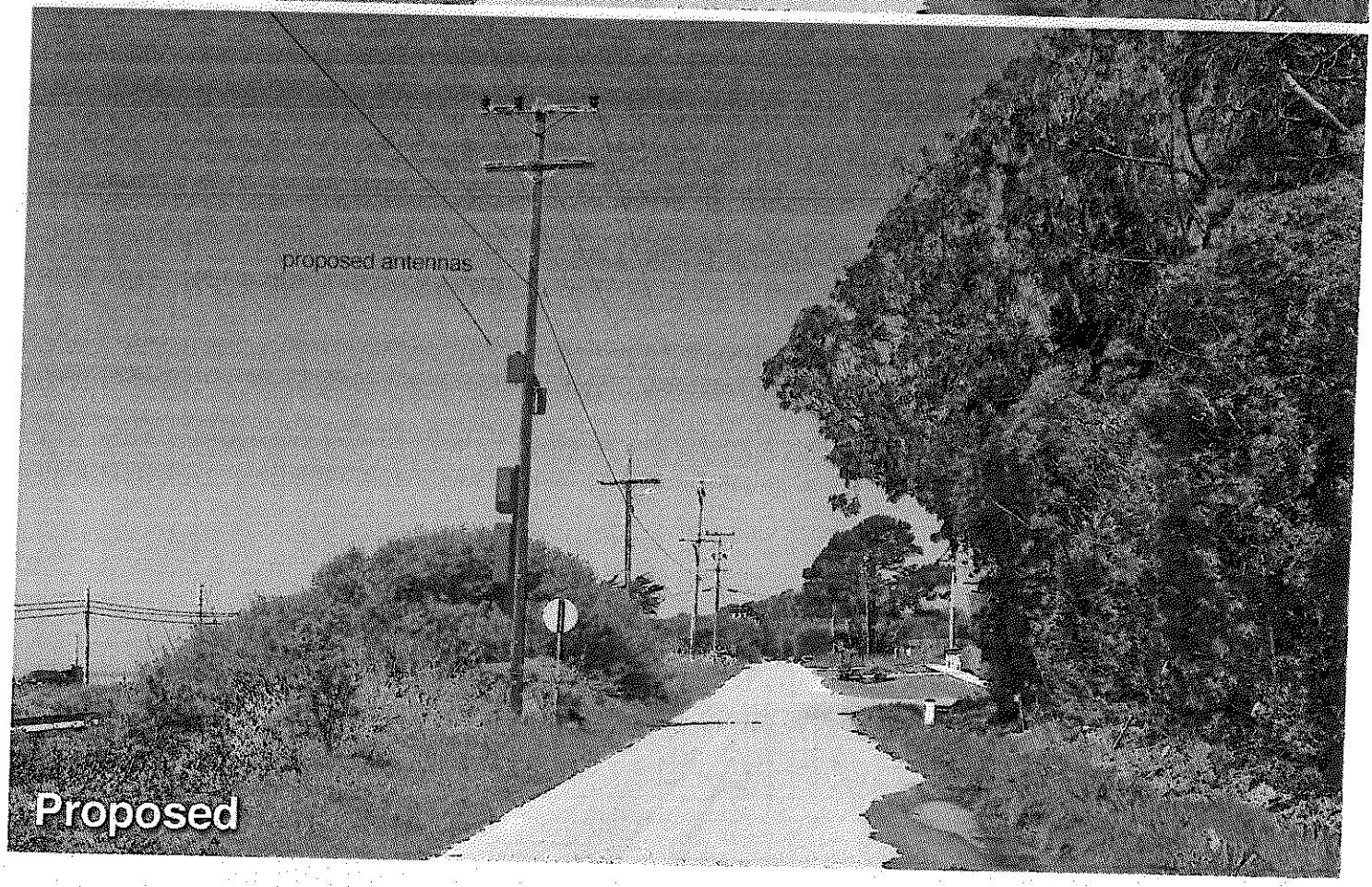
DAV-017

140 ft SW of 1st Ave
Davenport, CA

4/25/17

Aerial Map





CROWN CASTLE

DAV-017

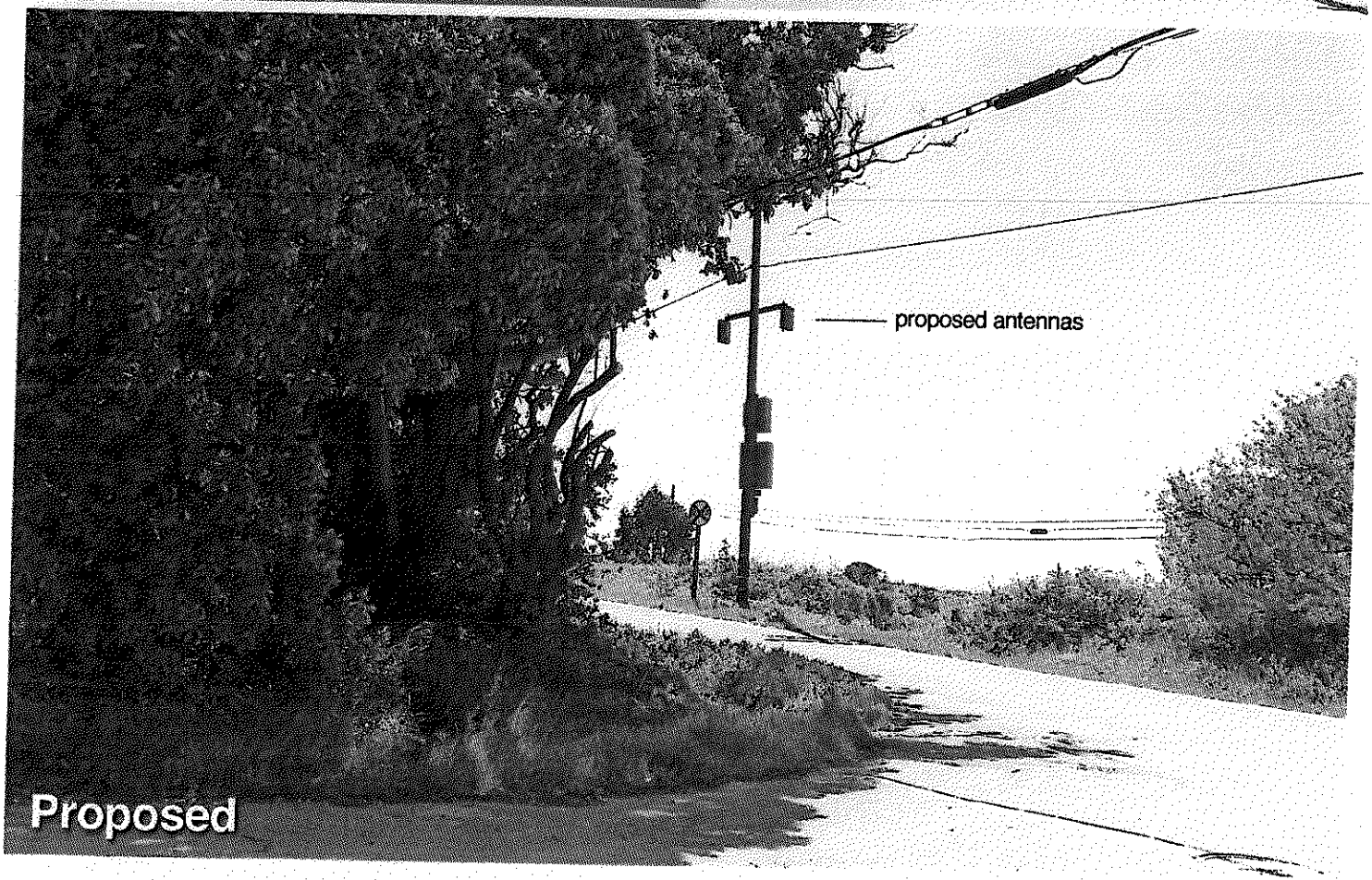
140 ft SW of 1st Ave
Davenport, CA

9/16/17

Looking Northwest from Cement Plant Road

View #1

Applied Imagination 510 914-0500



CROWN CASTLE

DAV-017

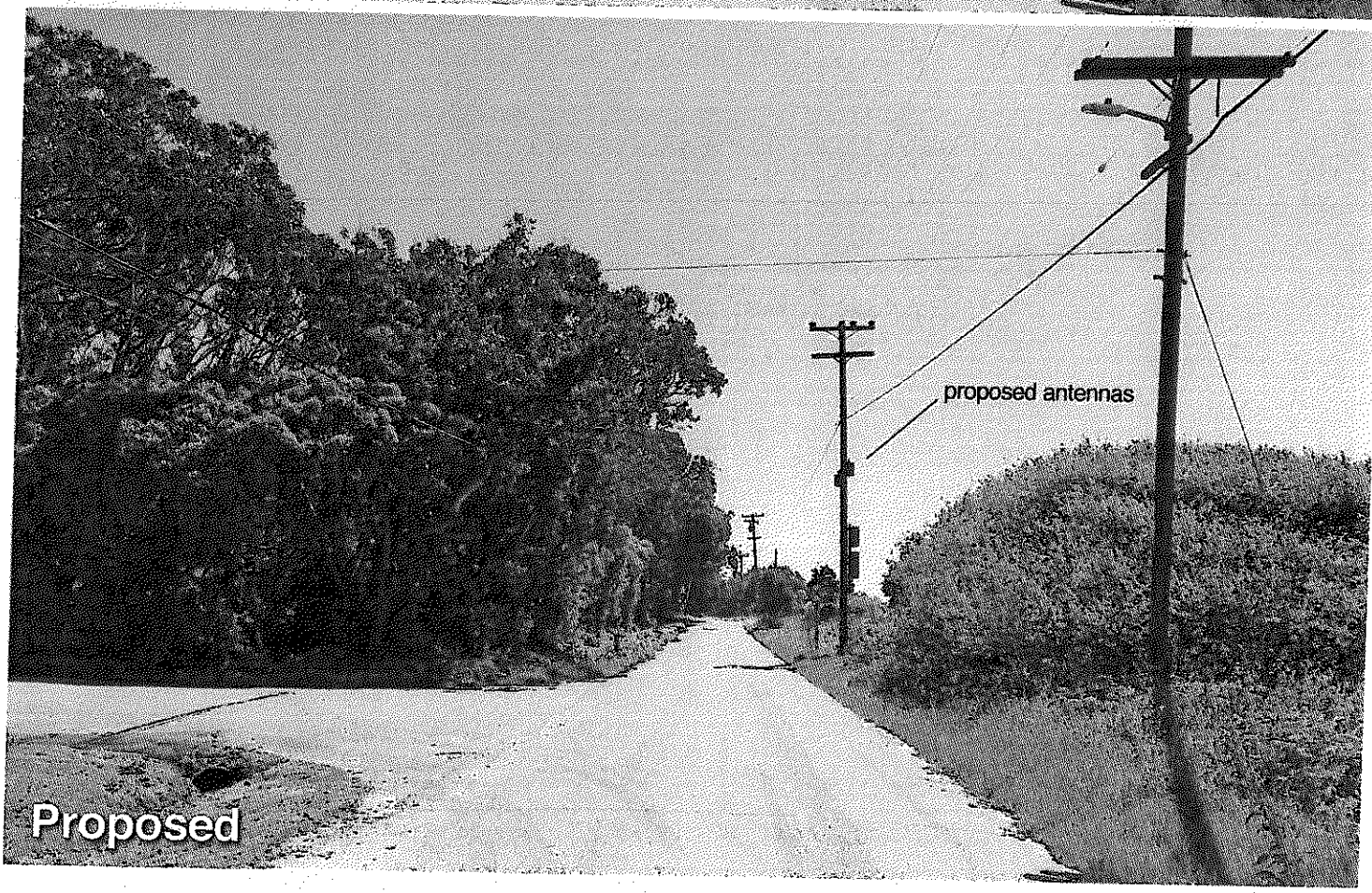
140 ft SW of 1st Ave
Davenport, CA

9/16/17

Looking South from 1st Avenue

View #2

Applied Imagination 510 914-0500



CROWN CASTLE

9/16/17

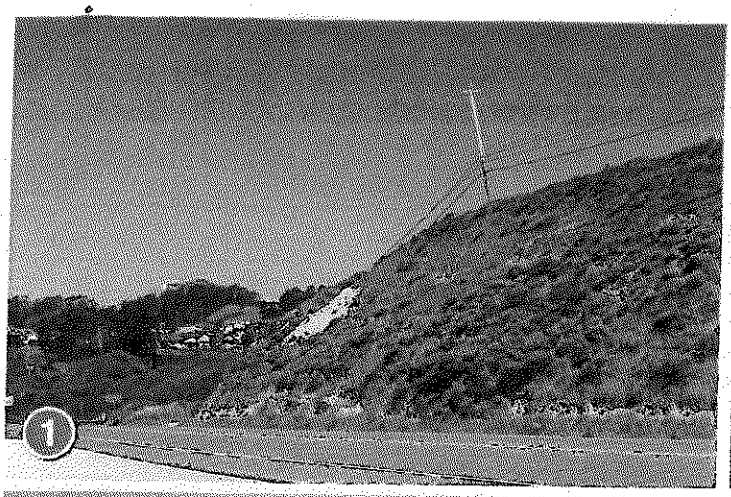
DAV-017

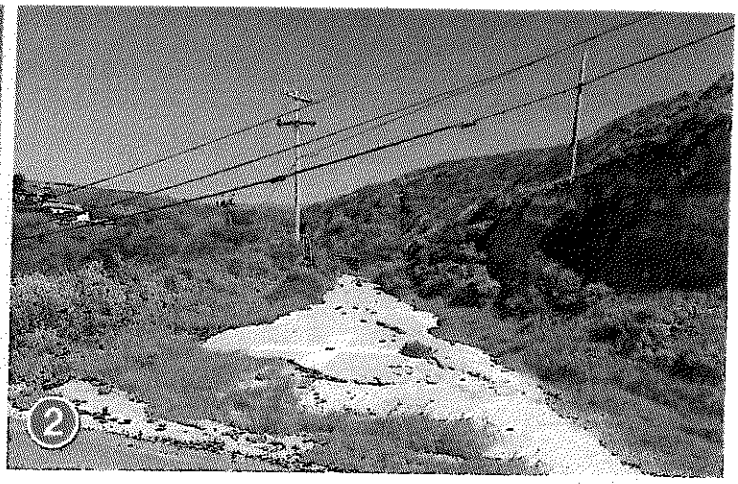
140 ft SW of 1st Ave
Davenport, CA

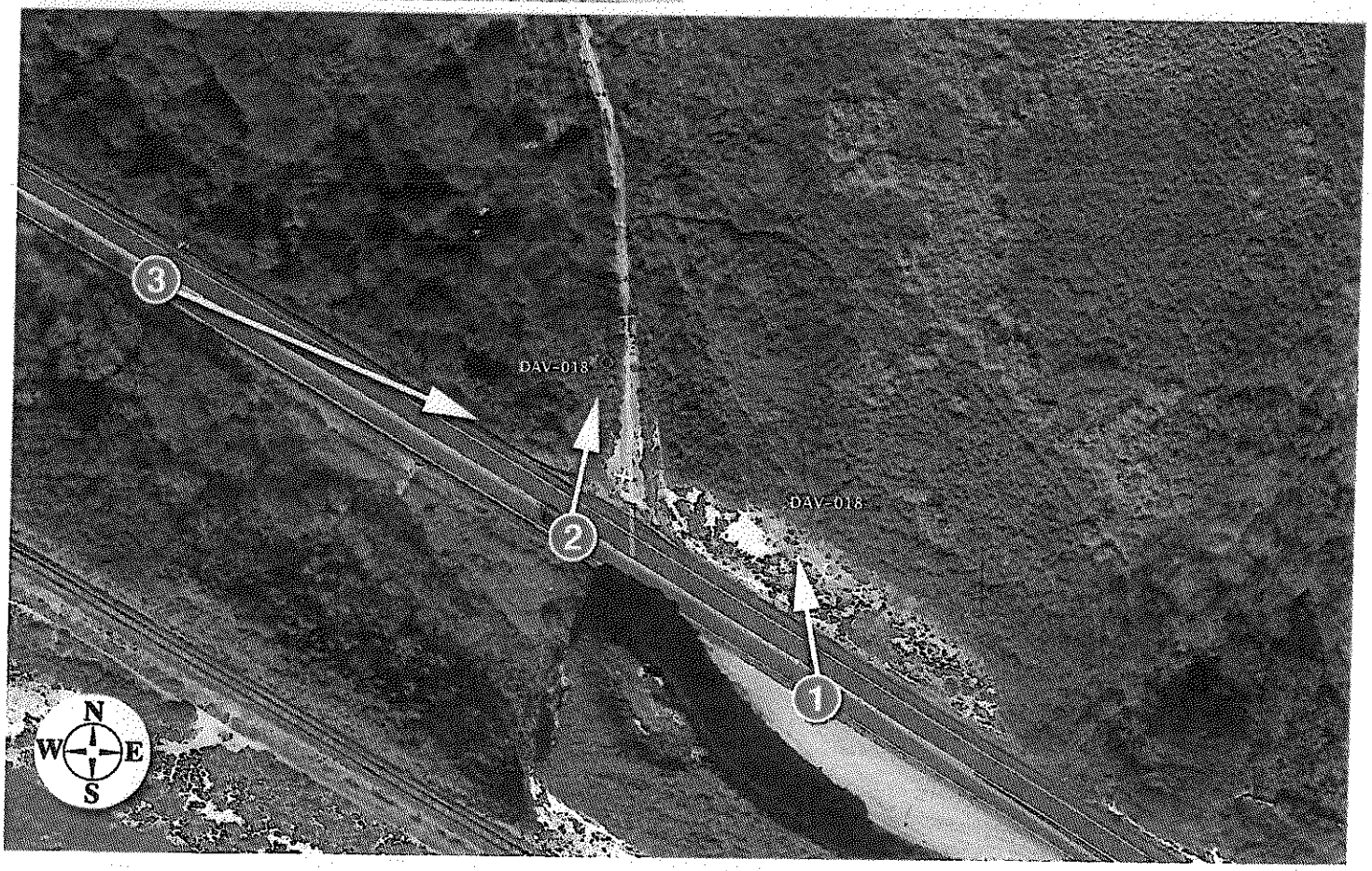
Looking Southeast from Cement Plant Road

View #3

Applied Imagination 510 914-0500







CROWN CASTLE

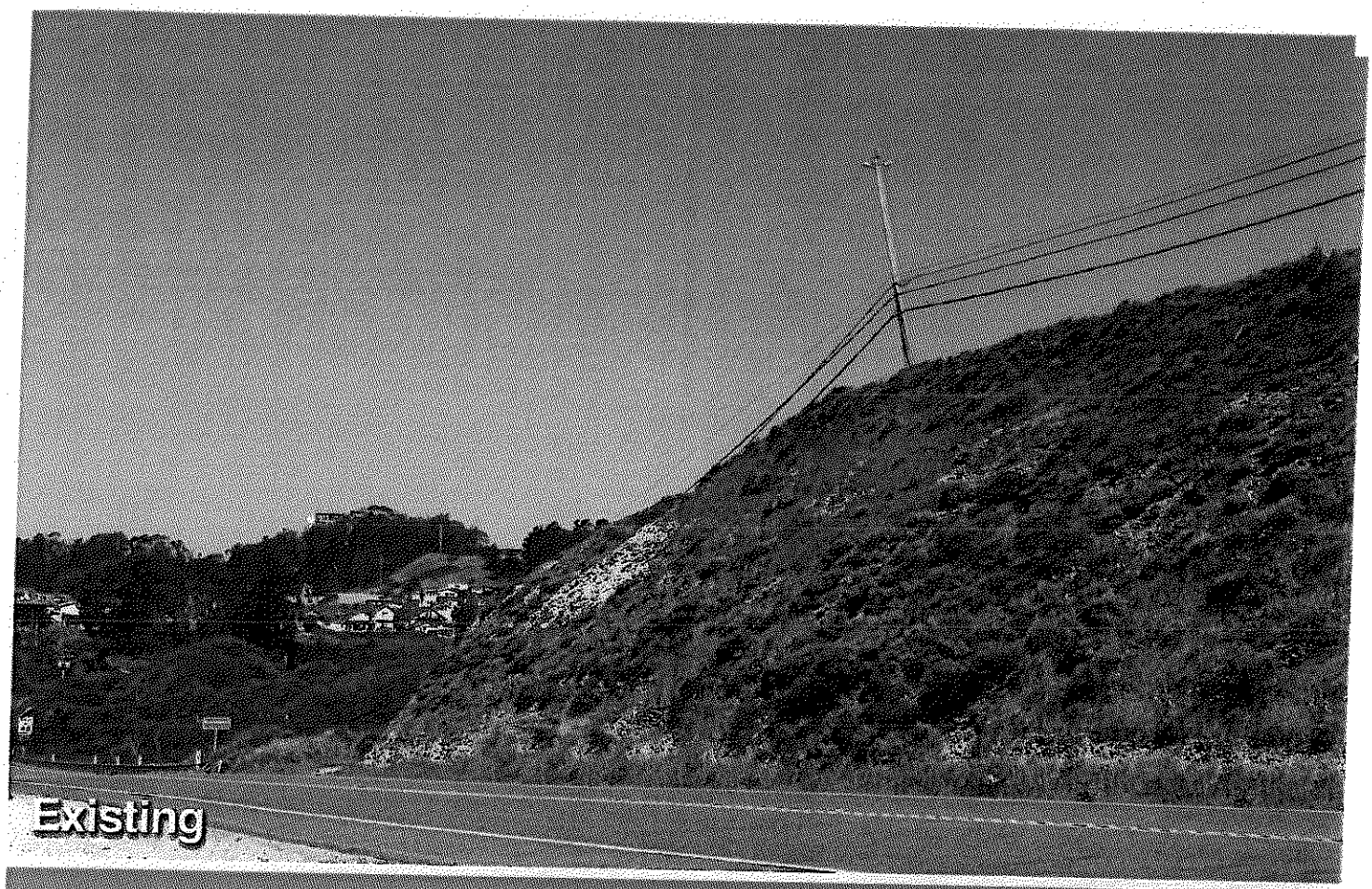
DAV-018

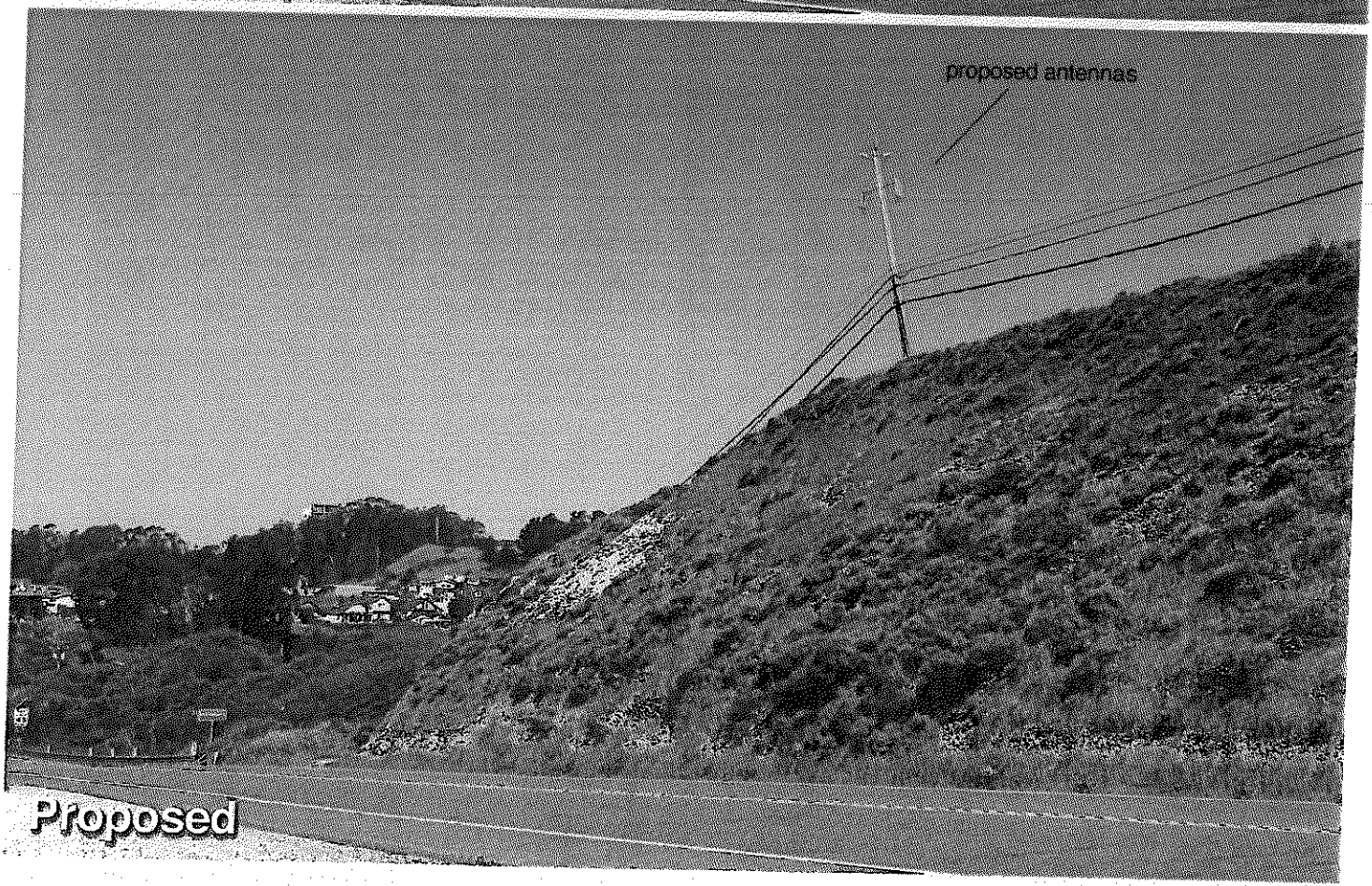
100 ft SE of Old Coast Rd / Cabrillo Hwy
Davenport, CA

4/25/17

Aerial Map

Applied Imagination 510 914-0500





CROWN CASTLE

9/16/17

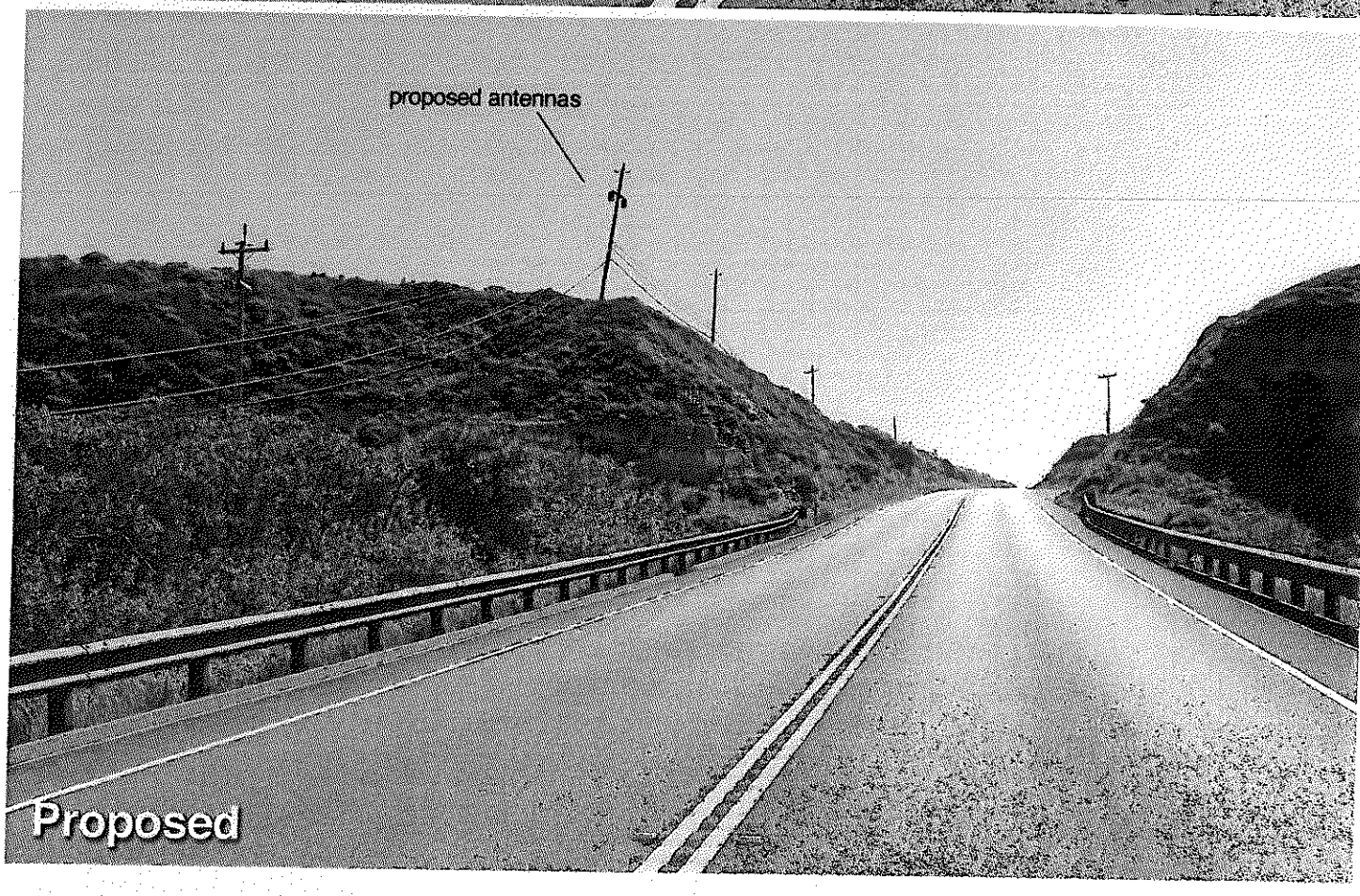
DAV-018

100 ft SE of Old Coast Rd / Cabrillo Hwy
Davenport, CA

Looking Northwest from Hwy 1

View #1

Applied Imagination 510 914-0500



CROWN CASTLE

9/16/17

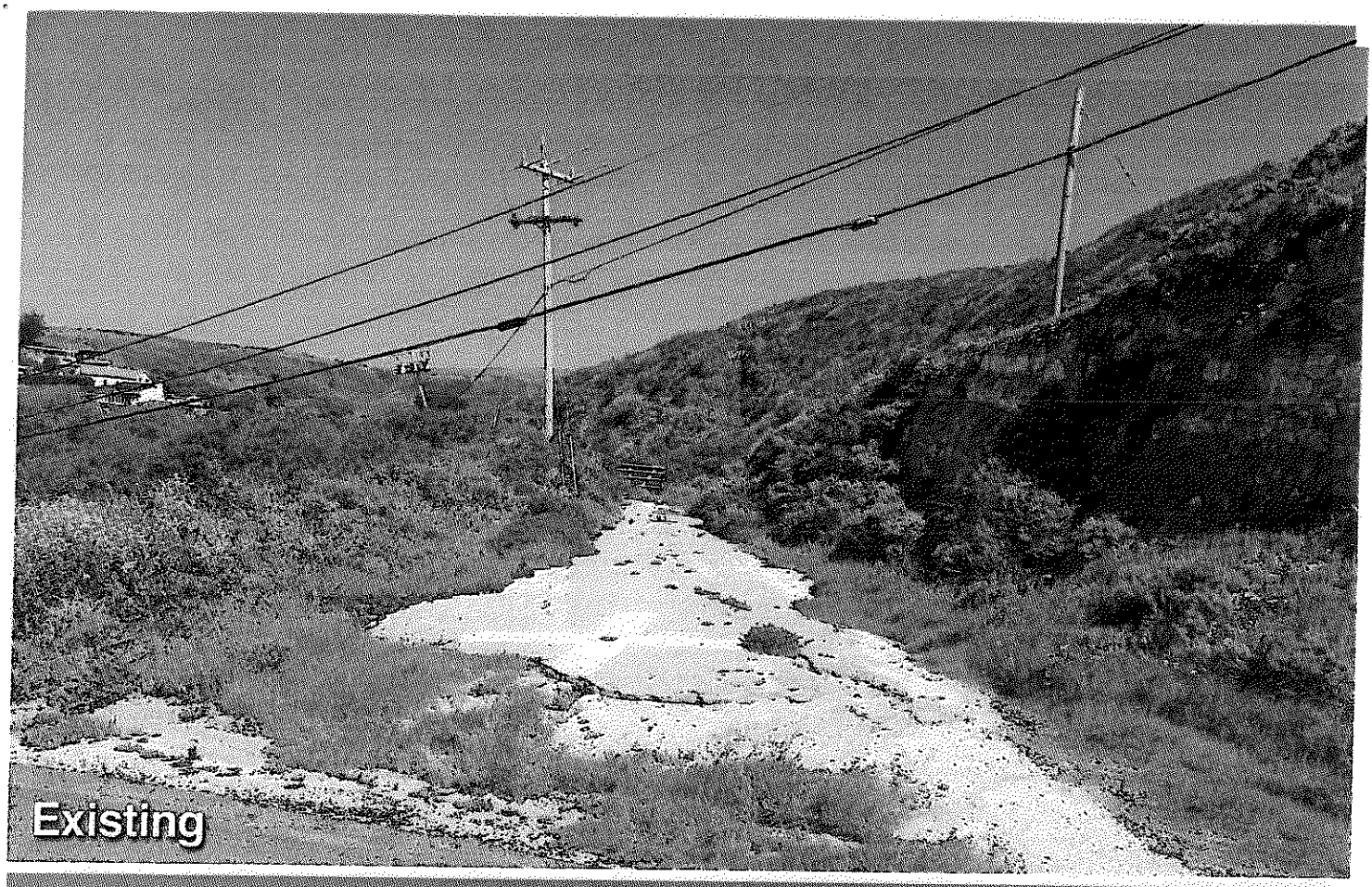
DAV-018

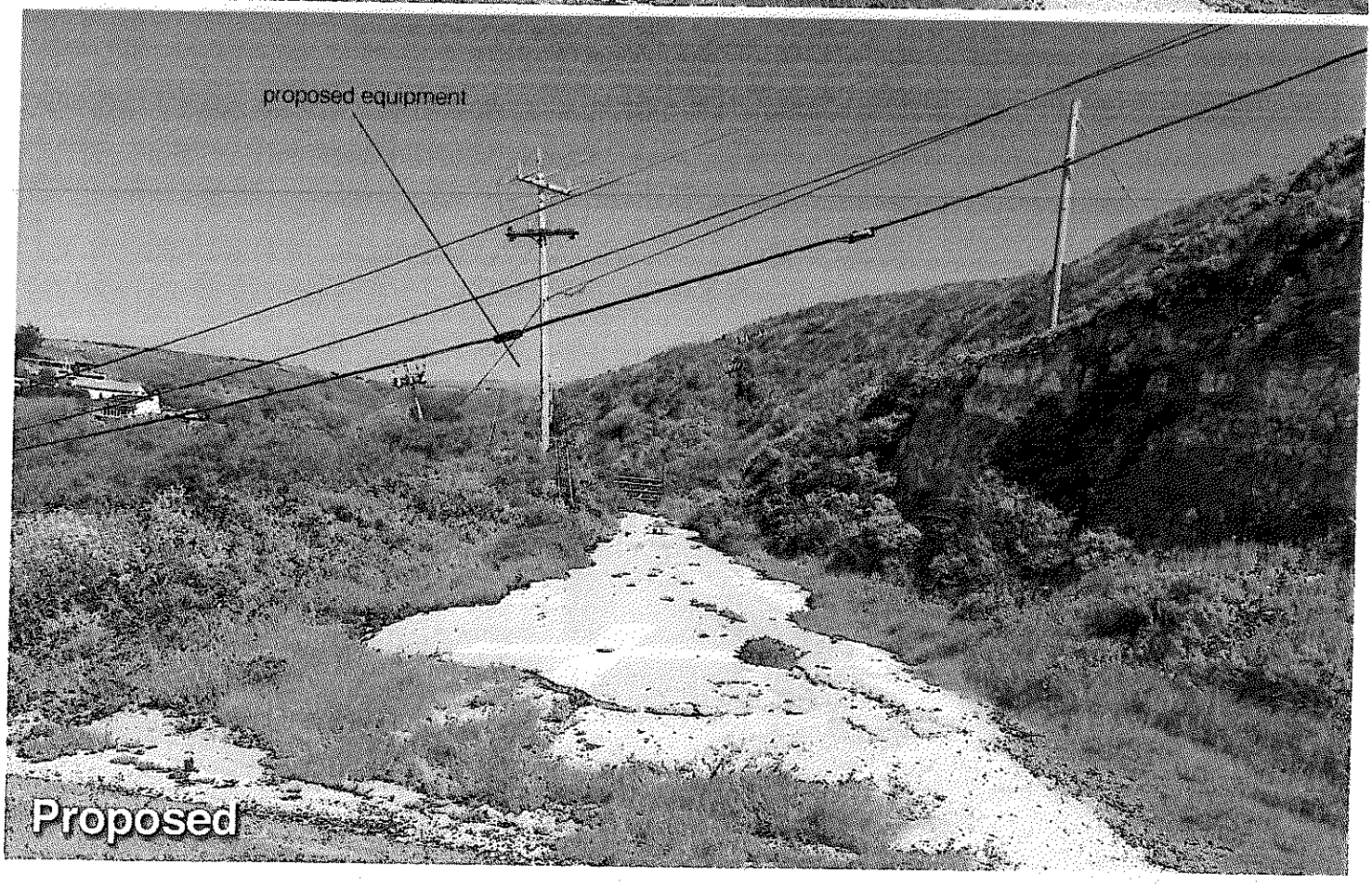
100 ft SE of Old Coast Rd / Cabrillo Hwy
Davenport, CA

Looking Southeast from Hwy 1

View #3

Applied Imagination 510 914-0500





CROWN CASTLE

9/16/17

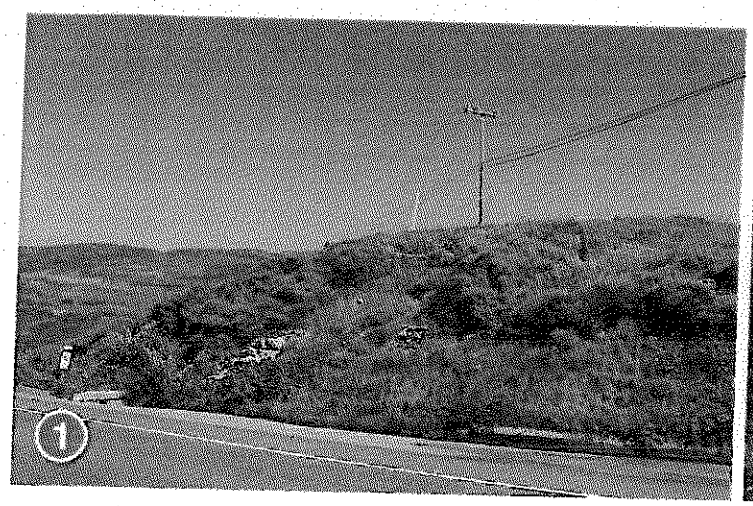
DAV-018

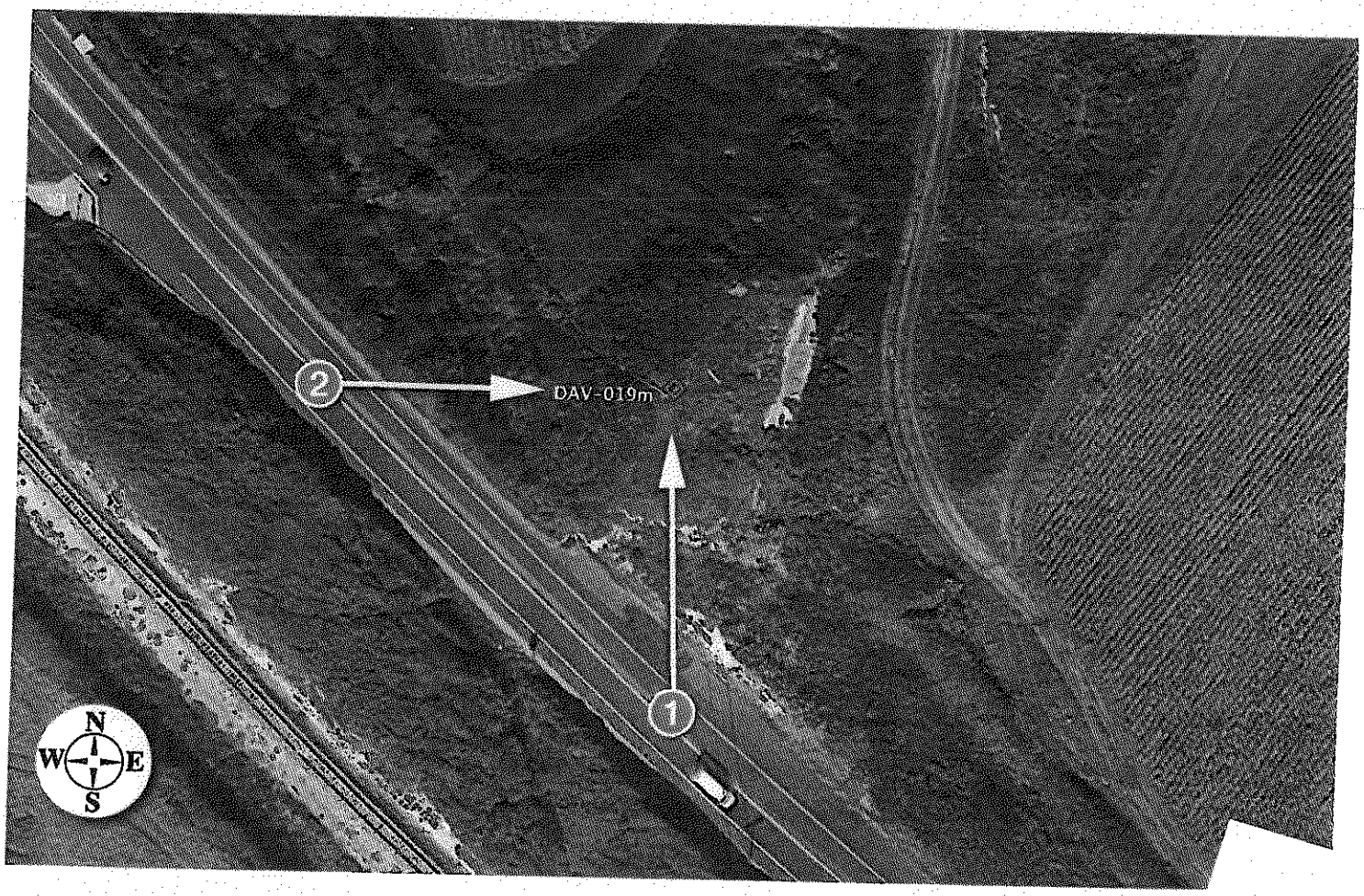
100 ft SE of Old Coast Rd / Cabrillo Hwy
Davenport, CA

Looking North from Hwy 1

View #2

Applied Imagination 510 914-0500





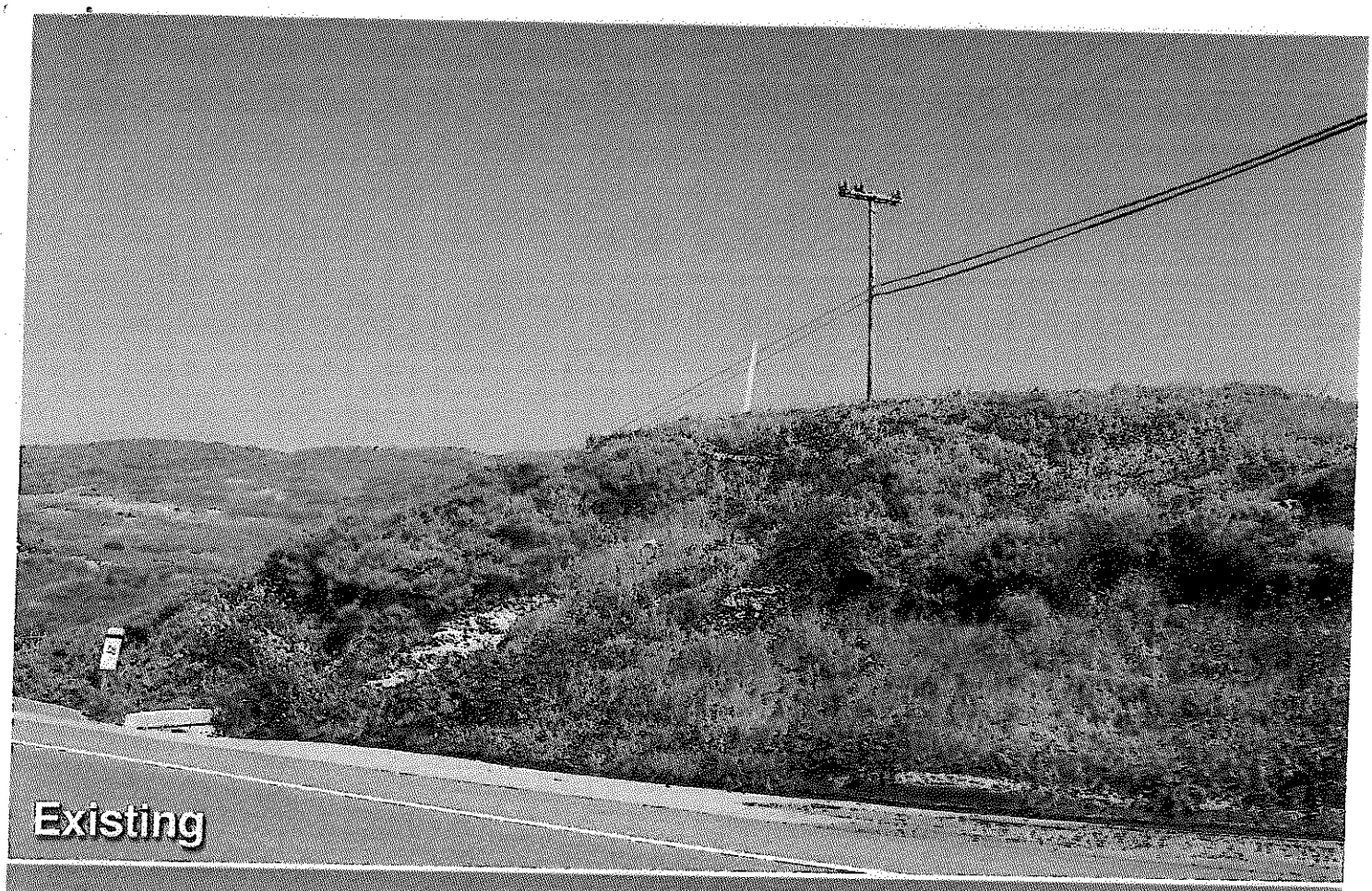
CROWN CASTLE

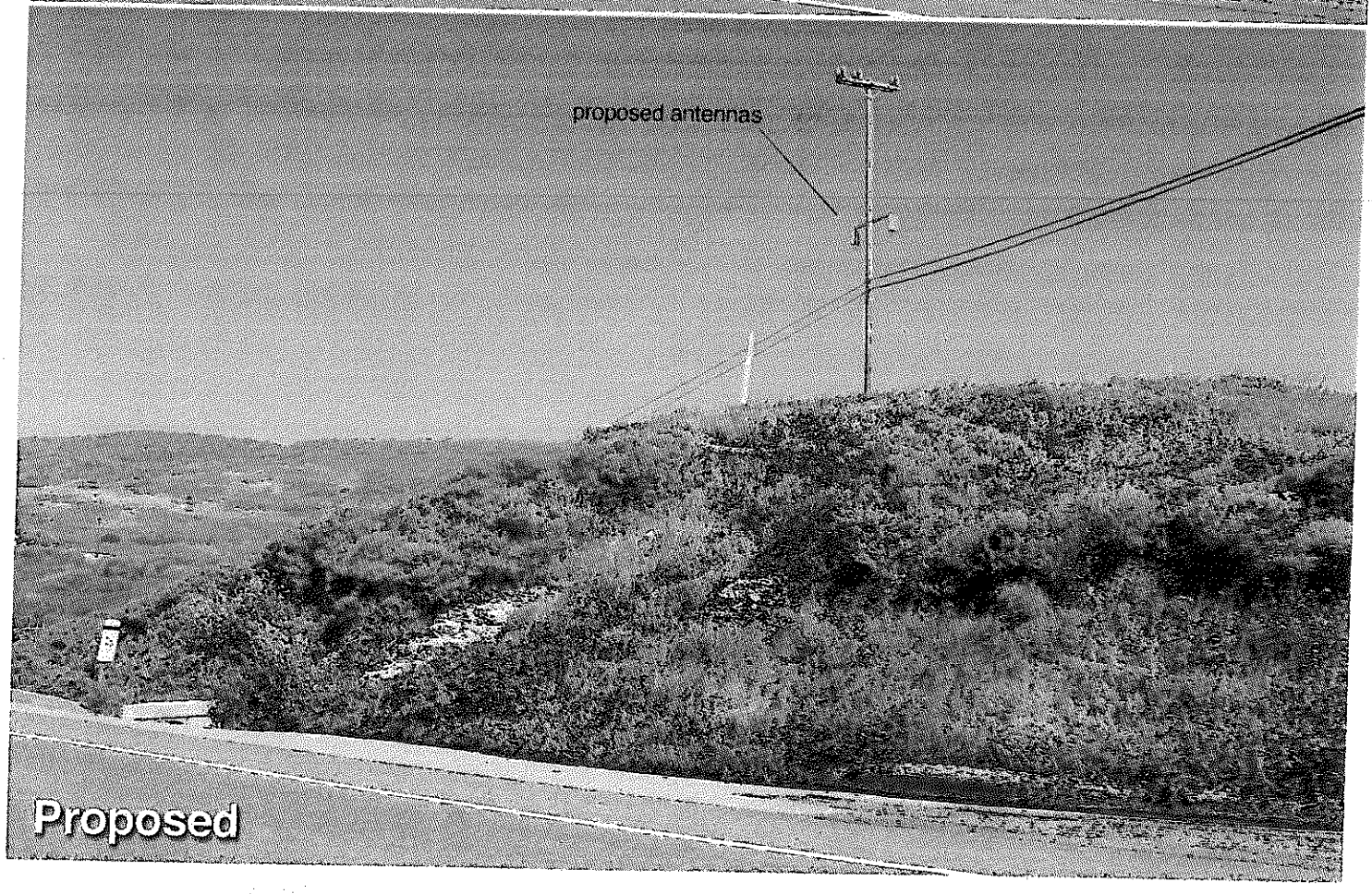
DAV-019m

1,100 ft SE of Bonny Doon Rd / Cabrillo Hwy
Davenport, CA

4/25/17

Applied Im





CROWN CASTLE

9/16/17

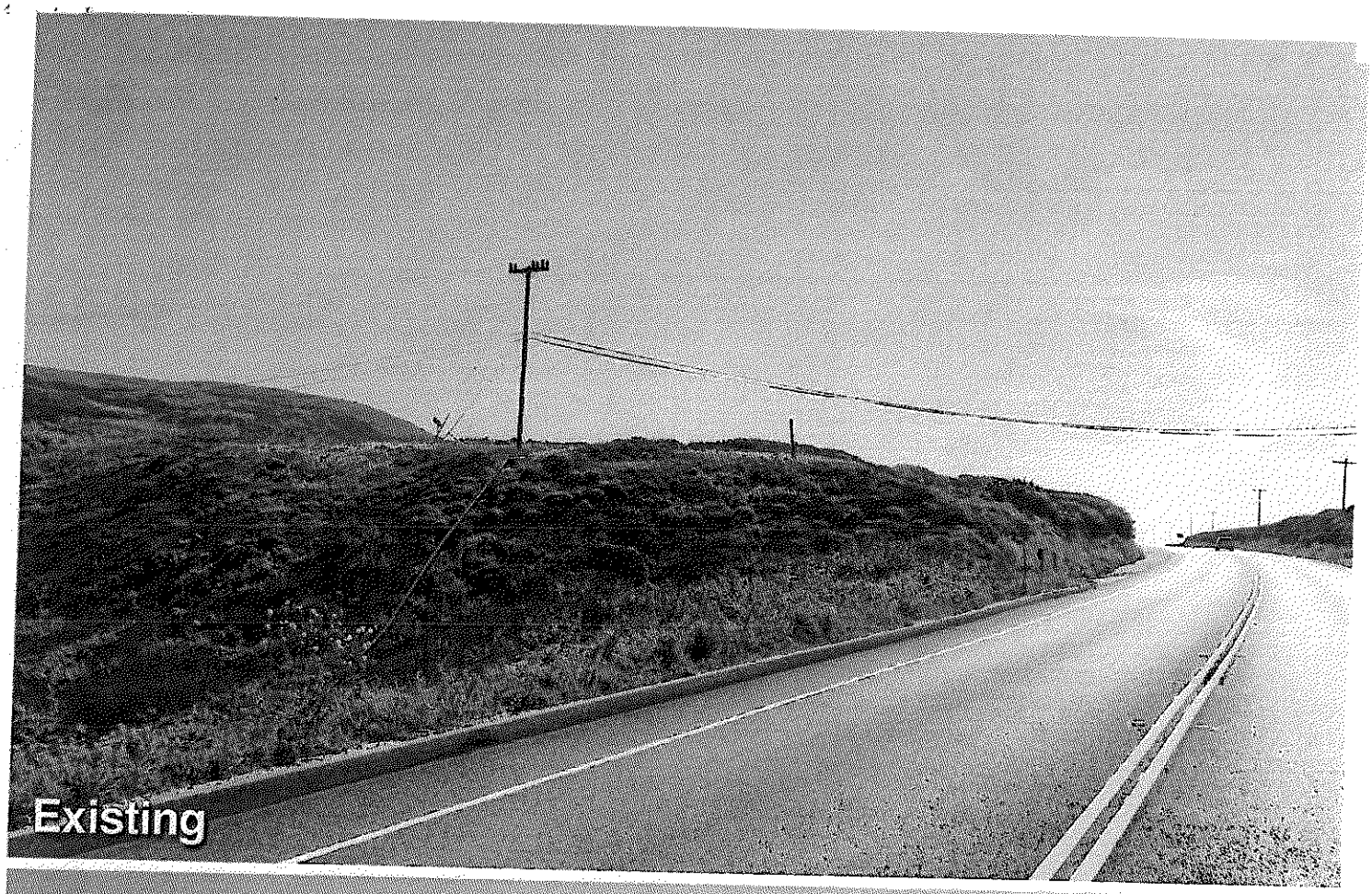
DAV-019m

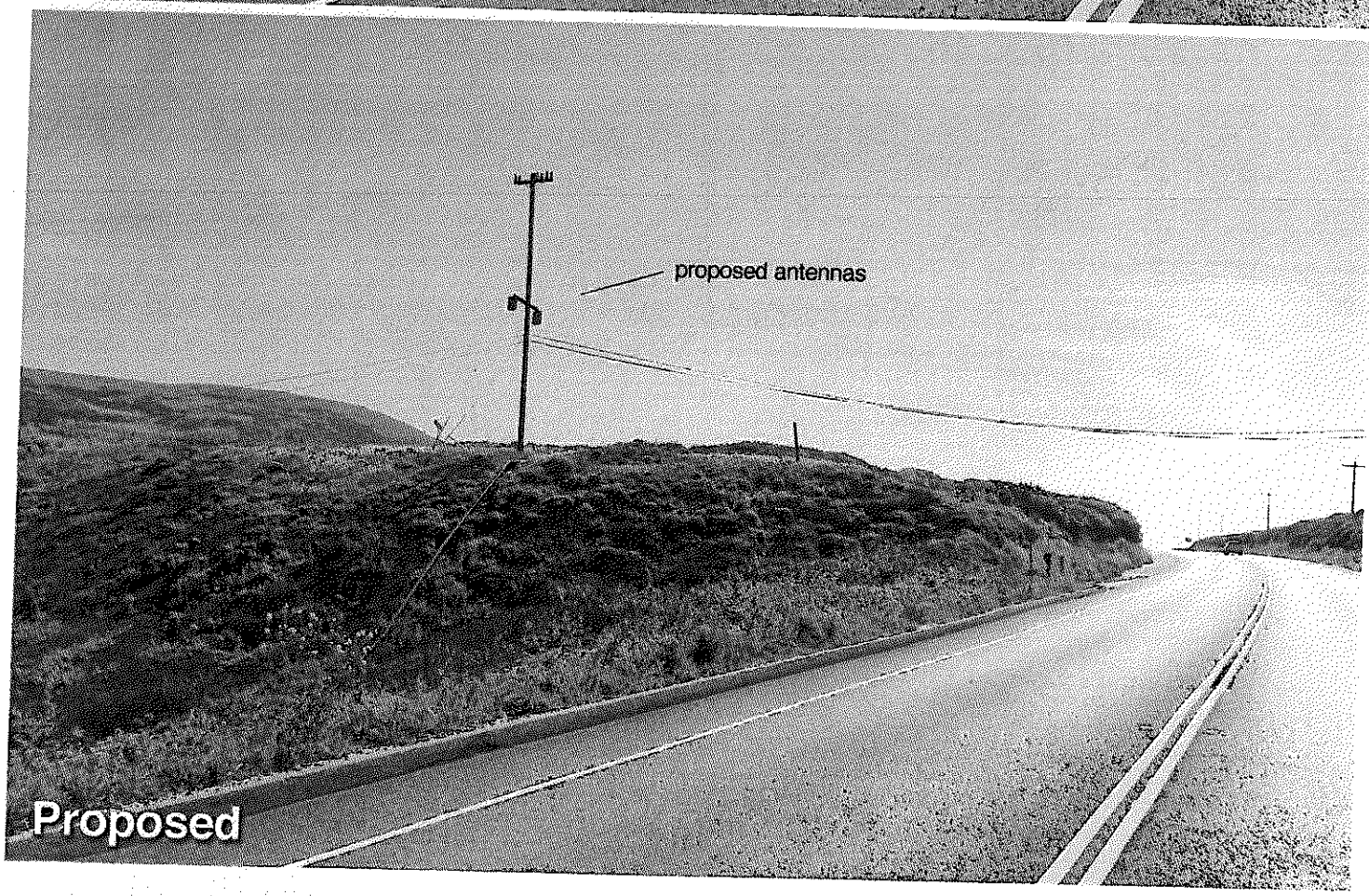
1,100 ft SE of Bonny Doon Rd / Cabrillo Hwy
Davenport, CA

Looking North from Hwy 1

View #1

Applied Imagination 510 914-0500





CROWN CASTLE

DAV-019m

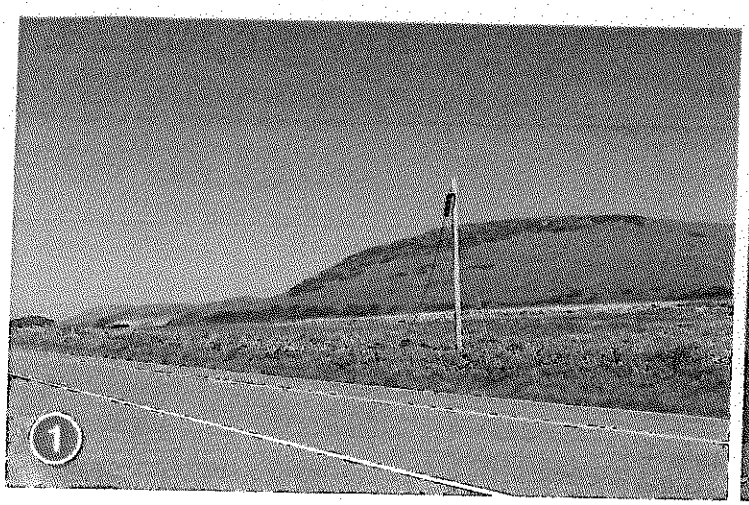
1,100 ft SE of Bonny Doon Rd / Cabrillo Hwy
Davenport, CA

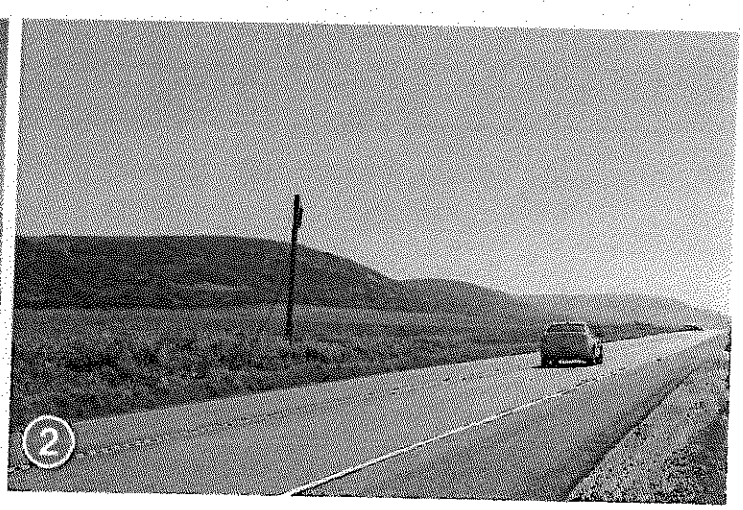
Looking East from Hwy 1

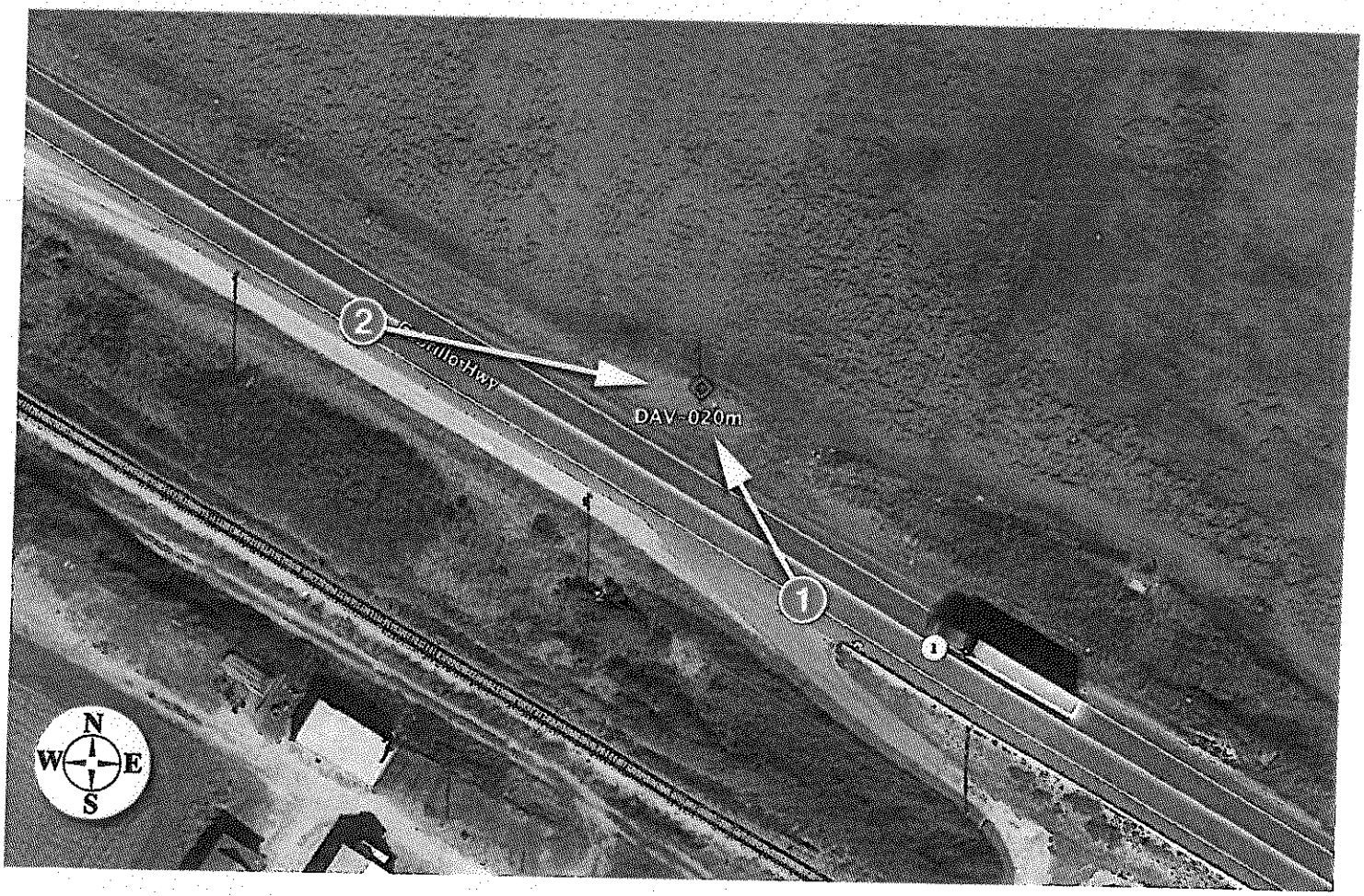
View #2

9/16/17

Applied Imagination 510 914-0500







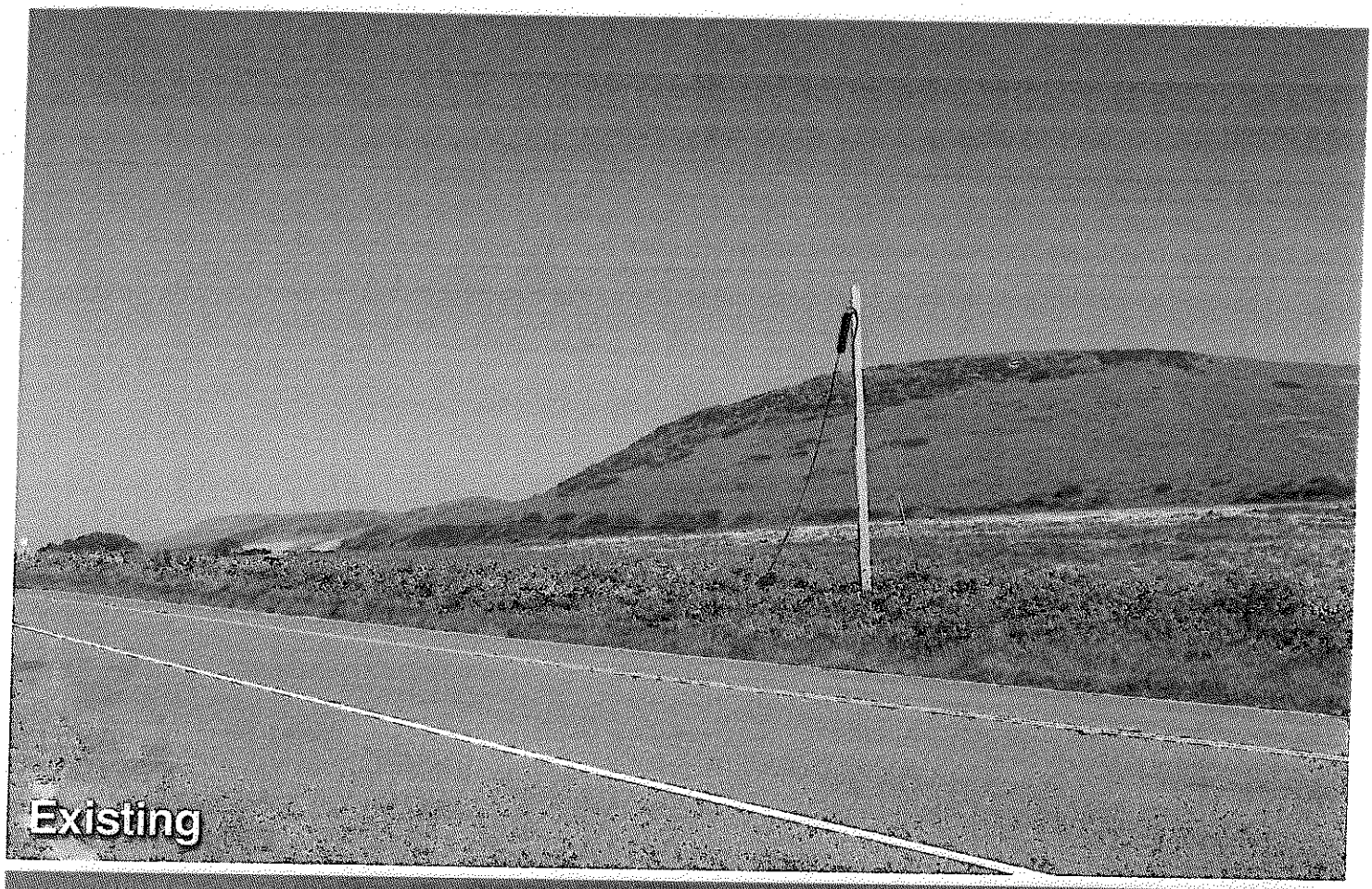
CROWN CASTLE

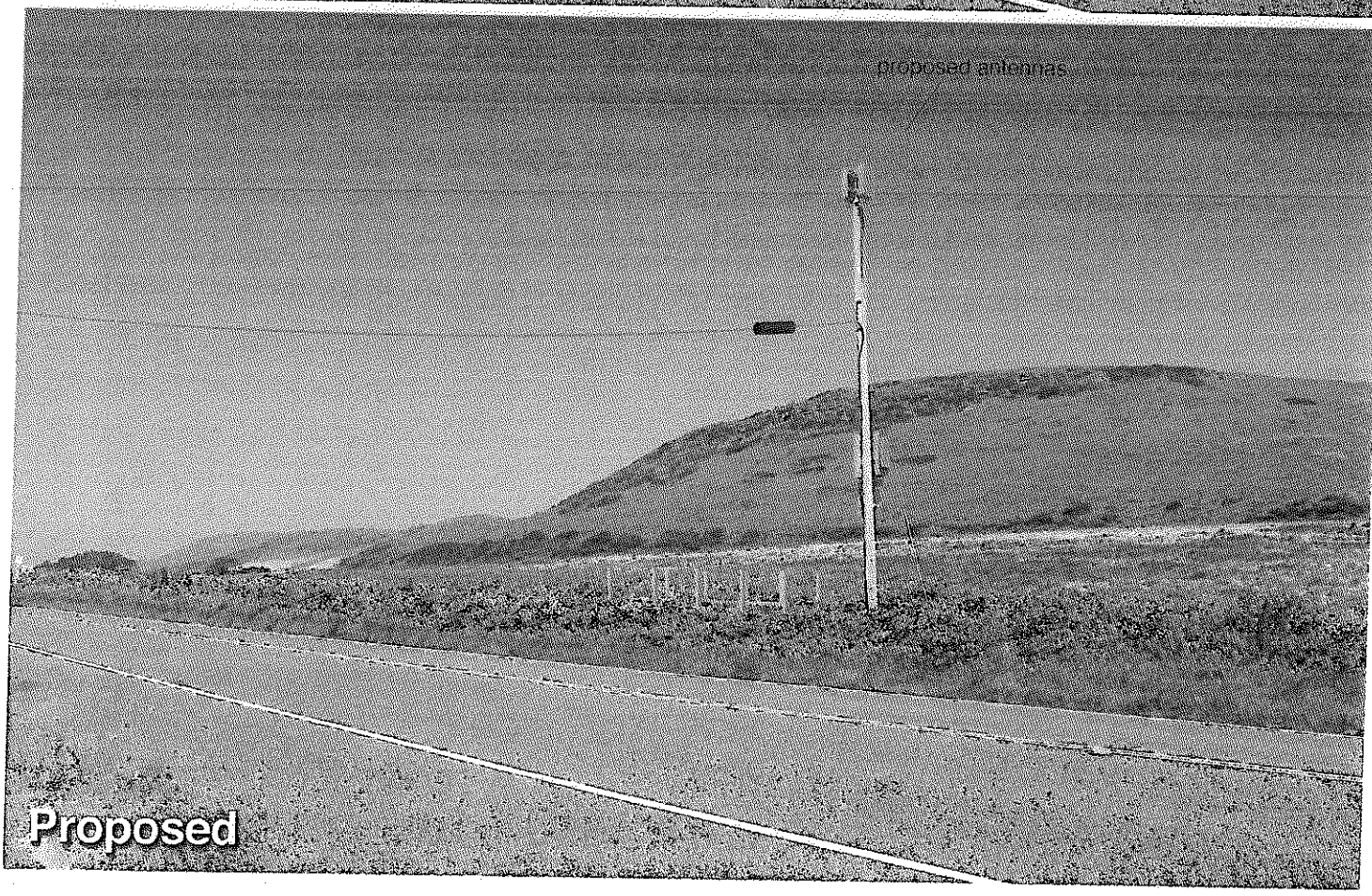
DAV-020m equipment vault option

Cabrillo Hwy
Davenport, CA

7/27/17

Aerial Map





CROWN CASTLE

9/16/17

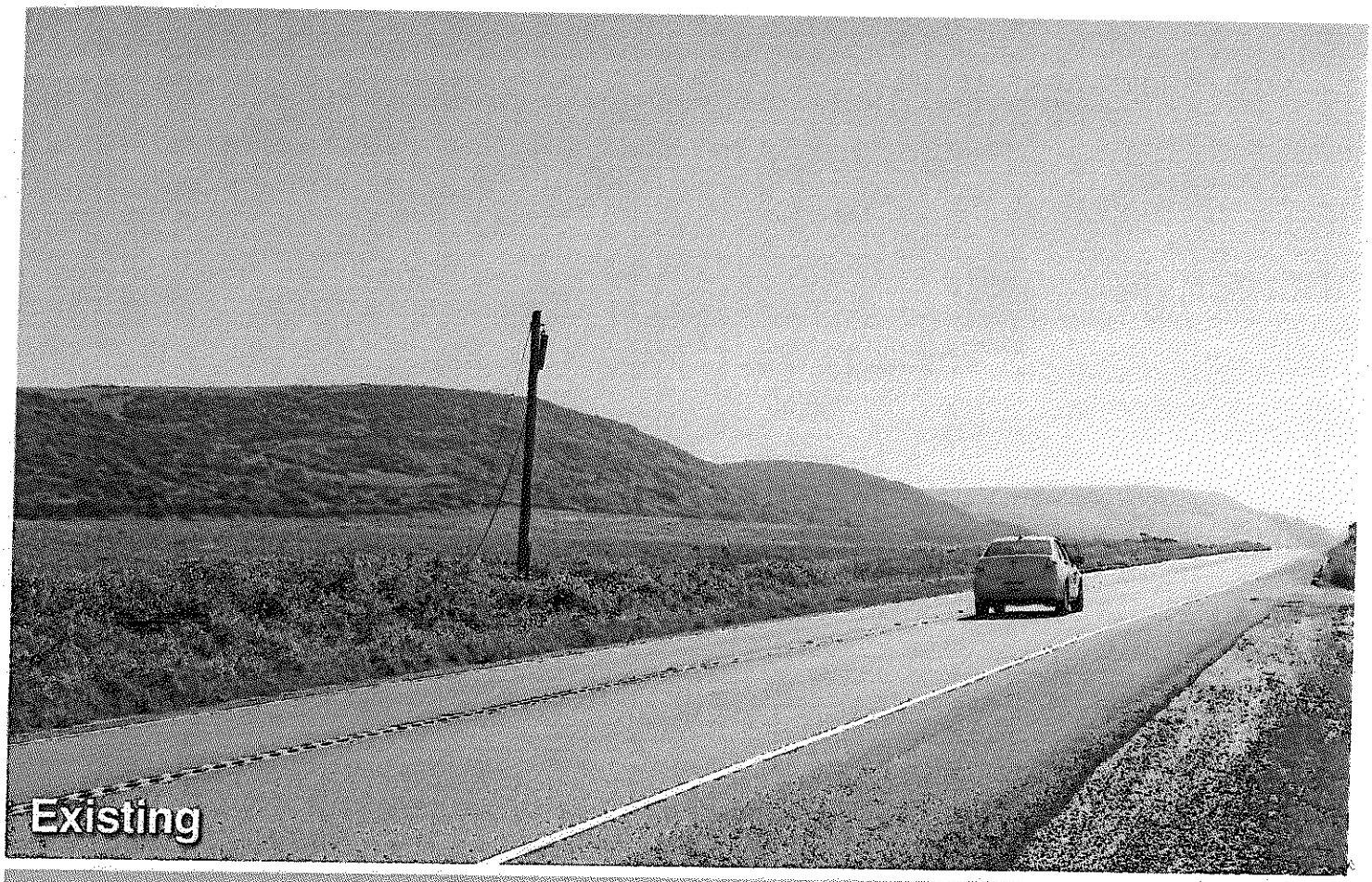
DAV-020m Vault Option

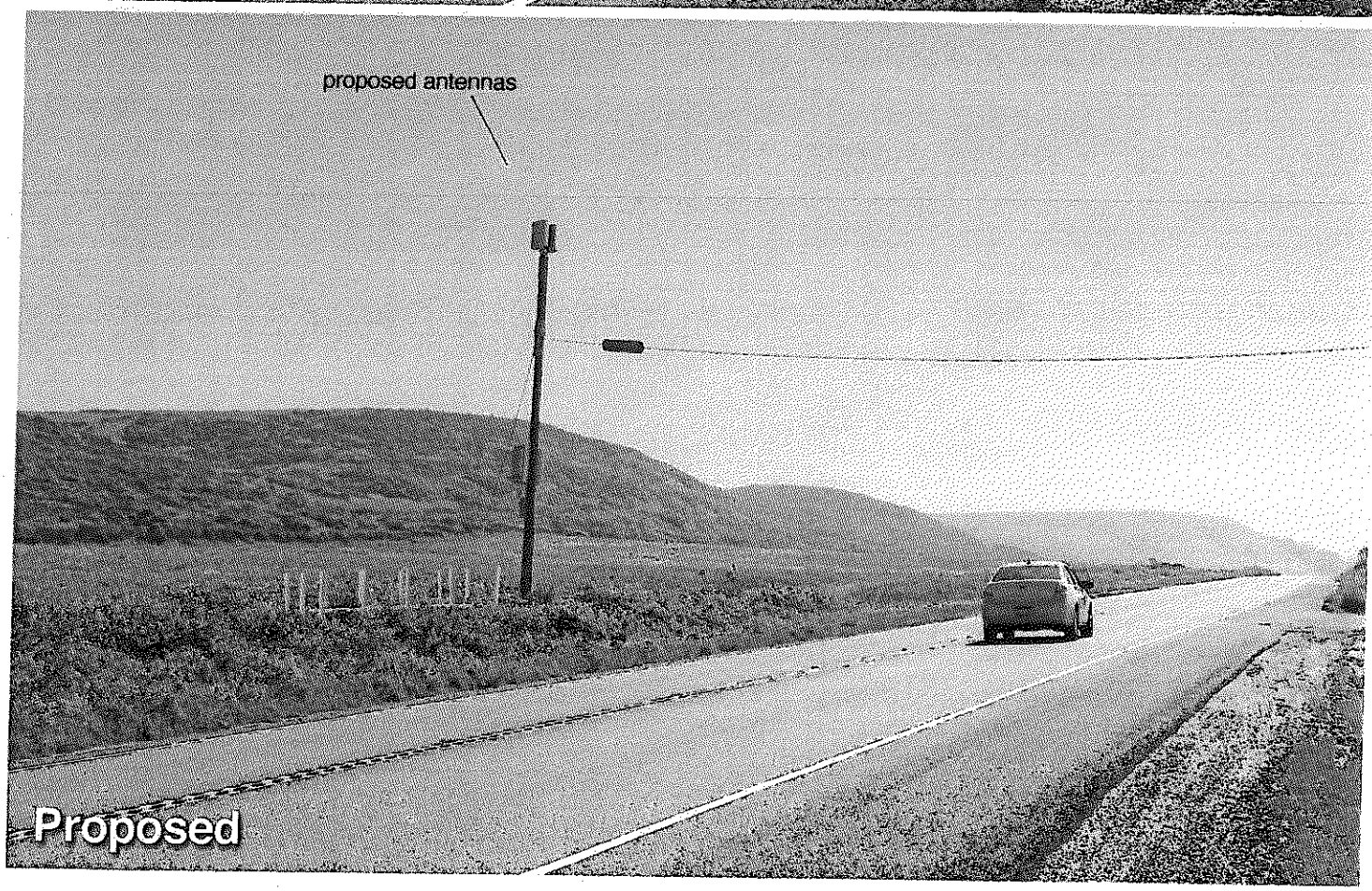
Cabrillo Hwy
Davenport, CA

Looking Northwest from Hwy 1

View #1

Applied Imagination 510 914-0500





CROWN CASTLE

9/16/17

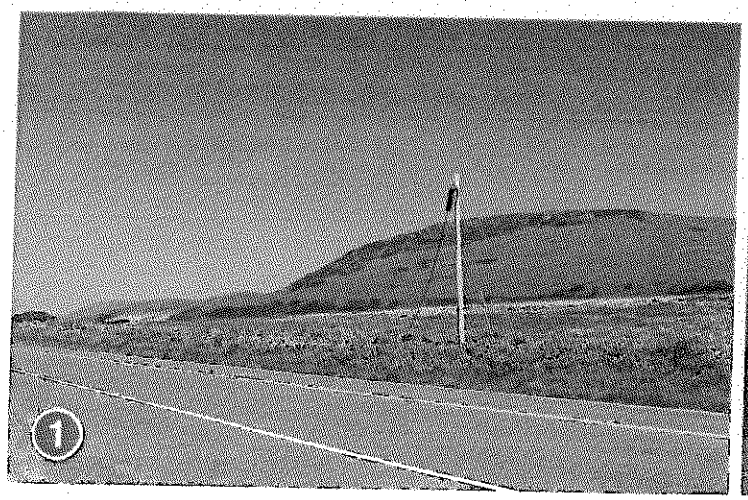
DAV-020m Vault Option

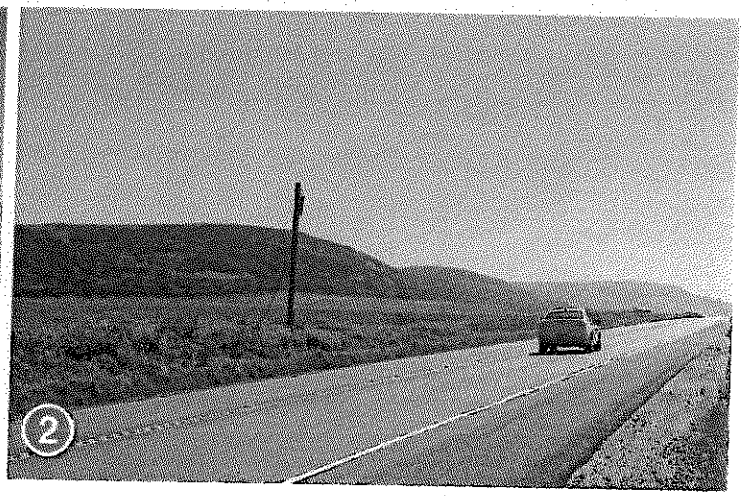
Cabrillo Hwy
Davenport, CA

Looking Southeast from Hwy 1

View #2

Applied Imagination 510 914-0500





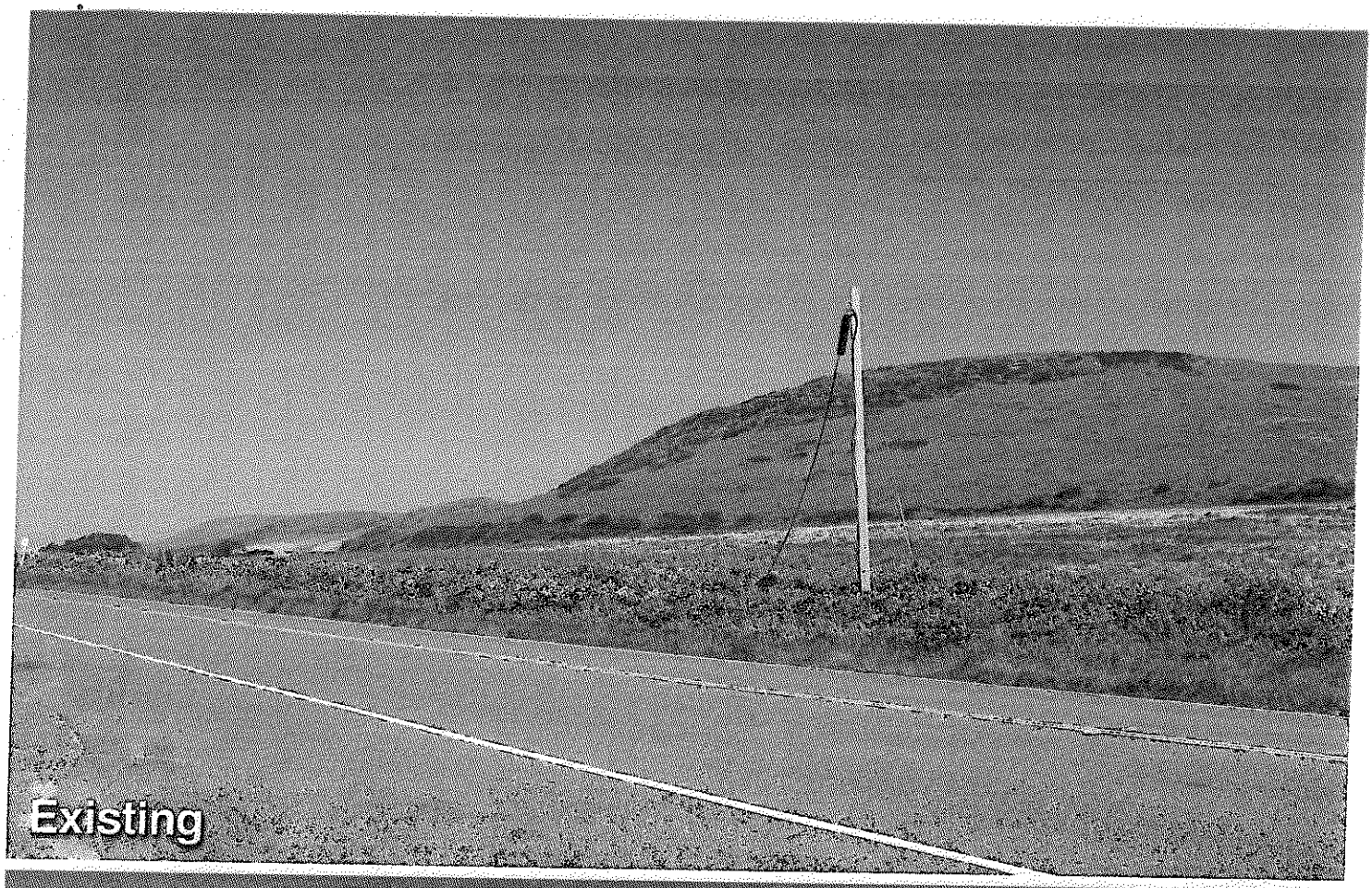
CROWN CASTLE

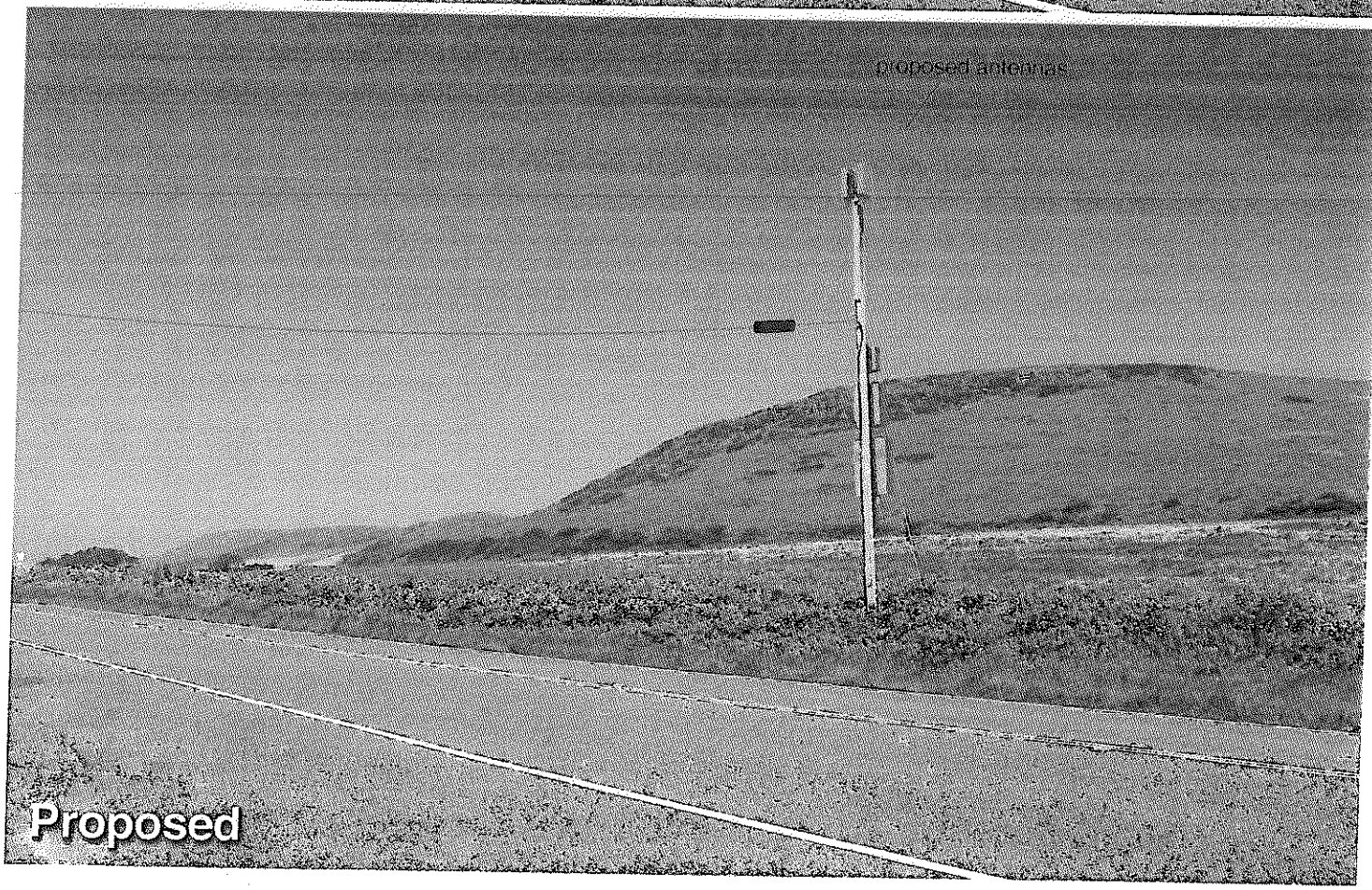
DAV-020m Pole Mounted Equipment Option

Aerial Map

7/27/17

Cabrillo Hwy
Davenport, CA





CROWN CASTLE

9/16/17

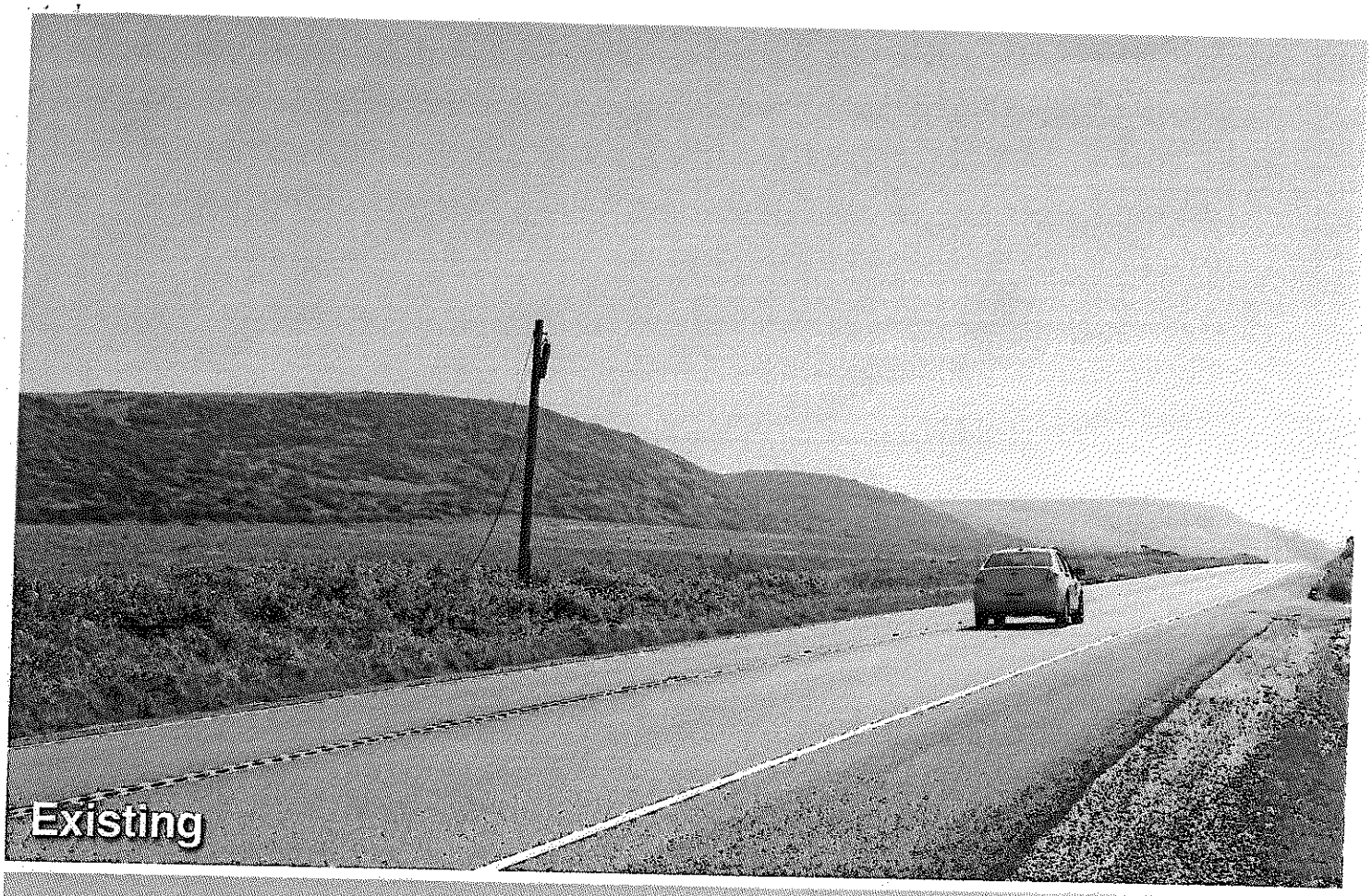
DAV-020m Pole Mounted Equipment Option

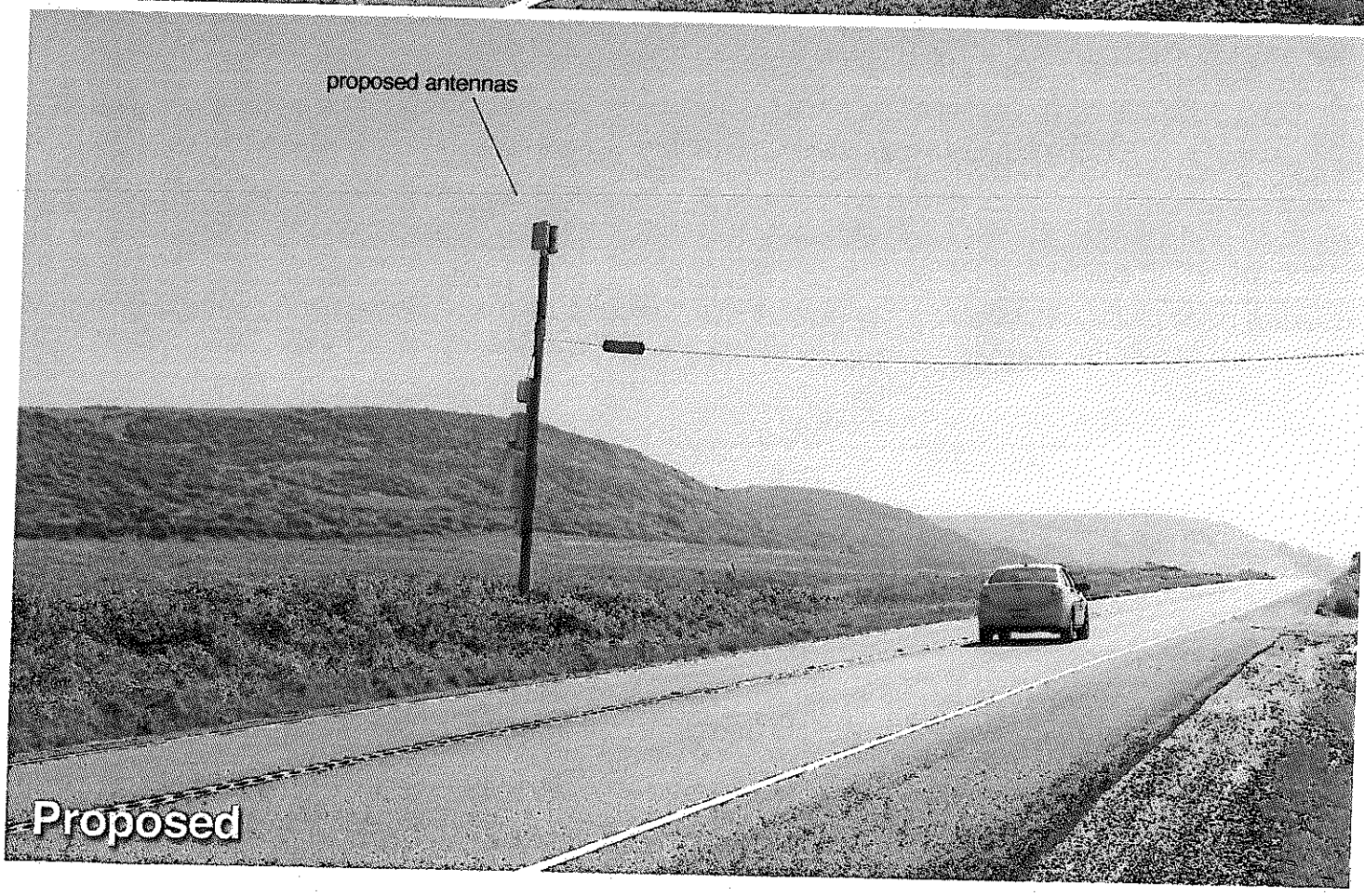
Cabrillo Hwy
Davenport, CA

Looking Northwest from Hwy 1

View #1

Applied Imagination 510 914-0500





CROWN CASTLE

DAV-020m Pole Mounted Equipment Option

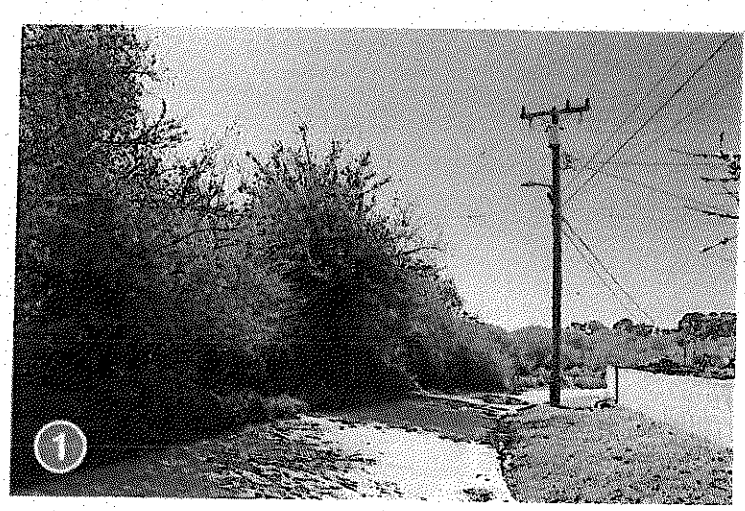
Looking Southeast from Hwy 1

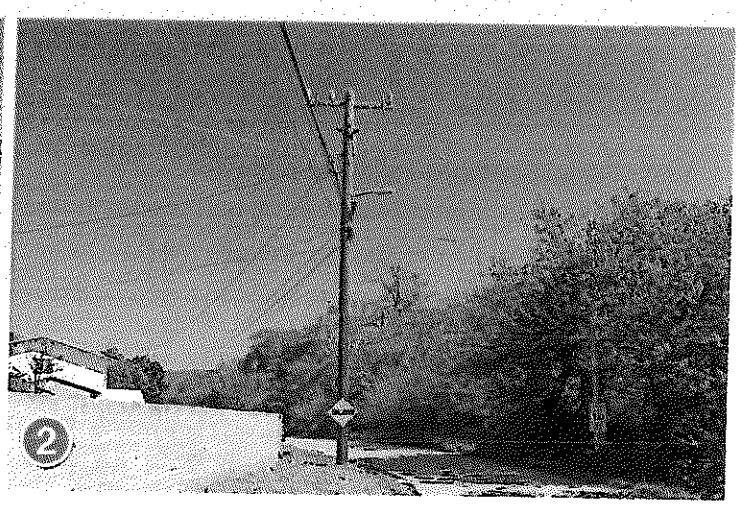
9/16/17

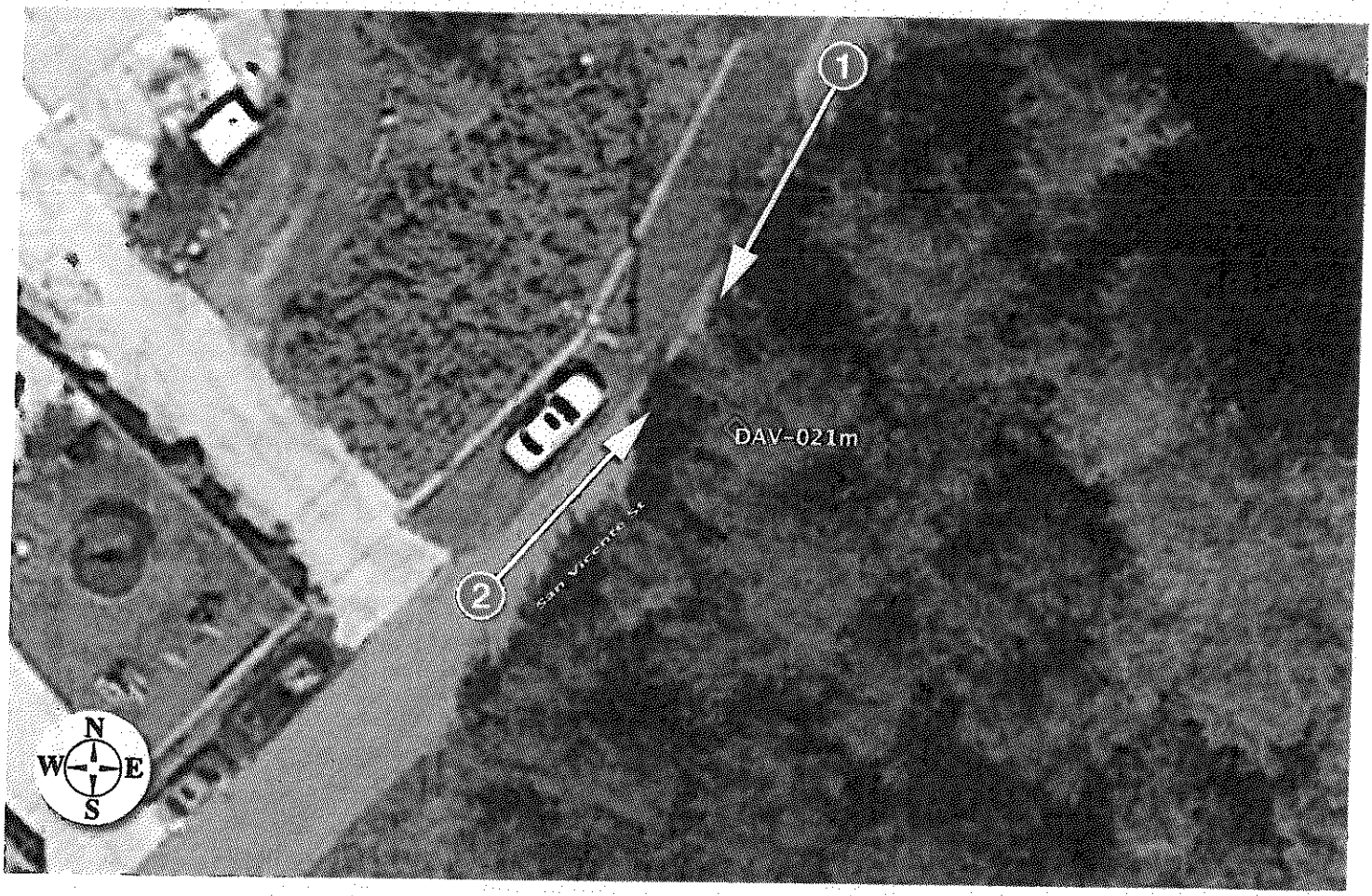
Cabrillo Hwy
Davenport, CA

View #2

Applied Imagination 510 914-0500







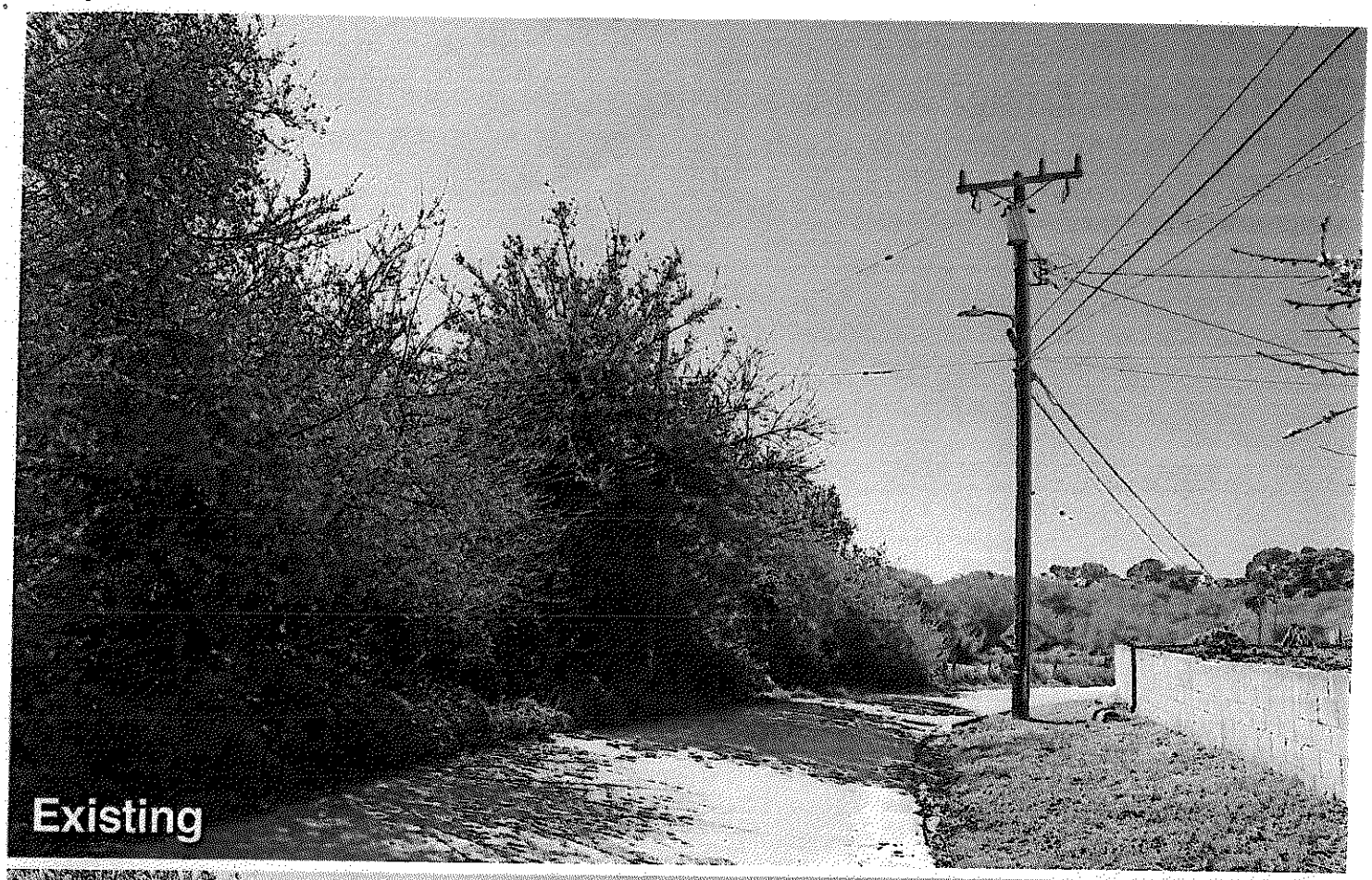
CROWN CASTLE

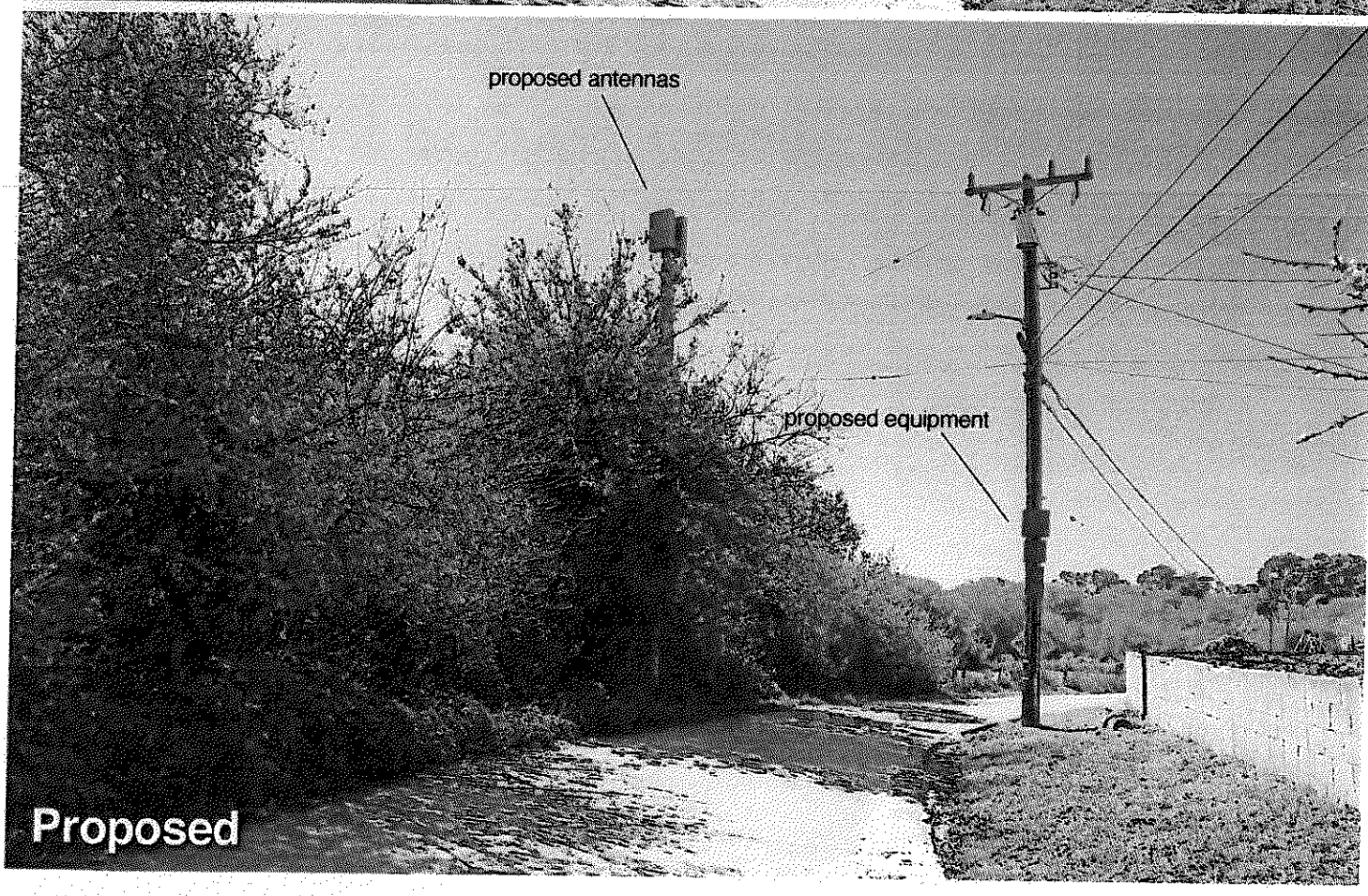
DAV-021m

Across 231 San Vicente St
Davenport, CA

Aerial Map

4/25/17





CROWN CASTLE

9/16/17

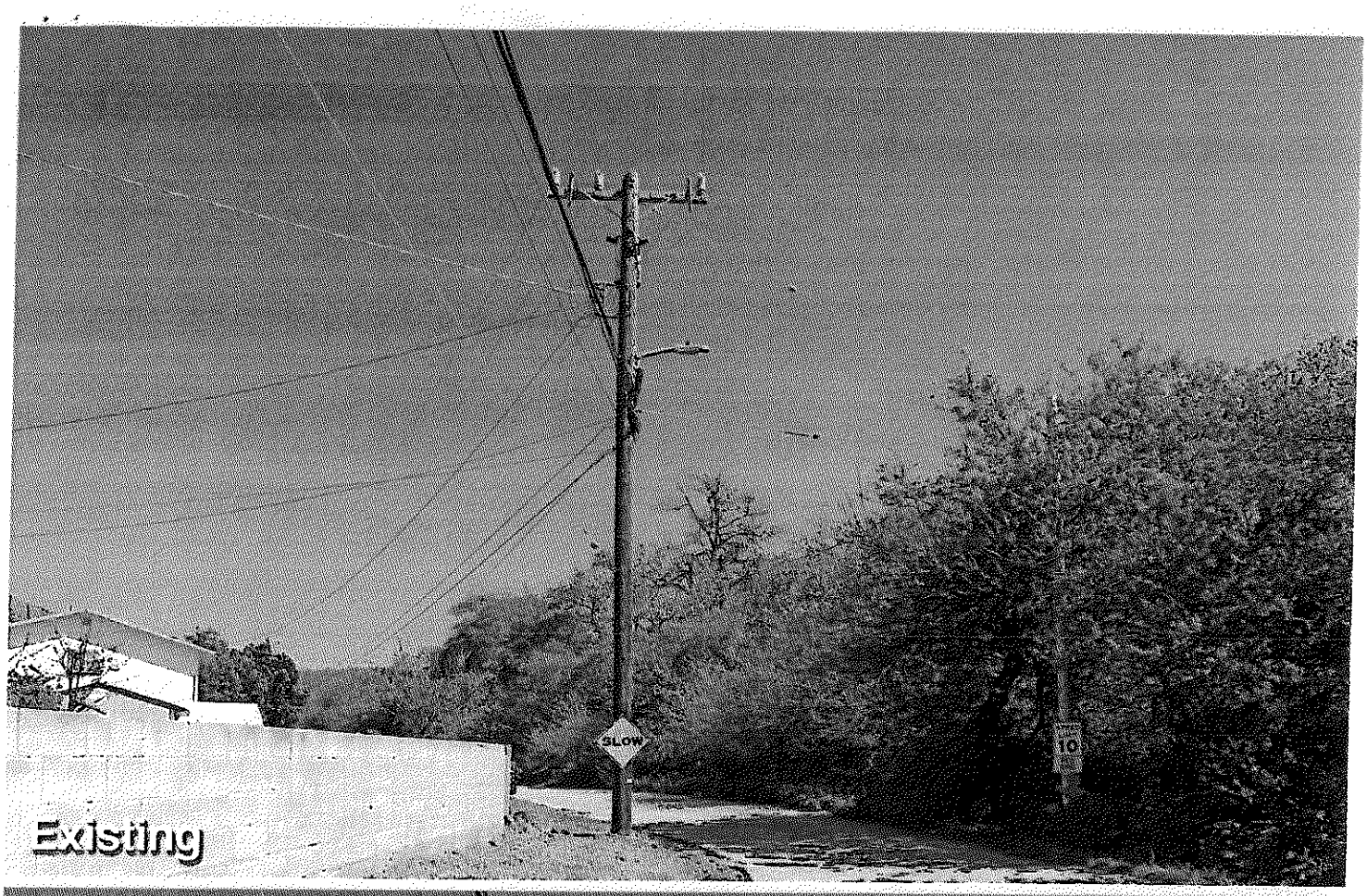
DAV-021m

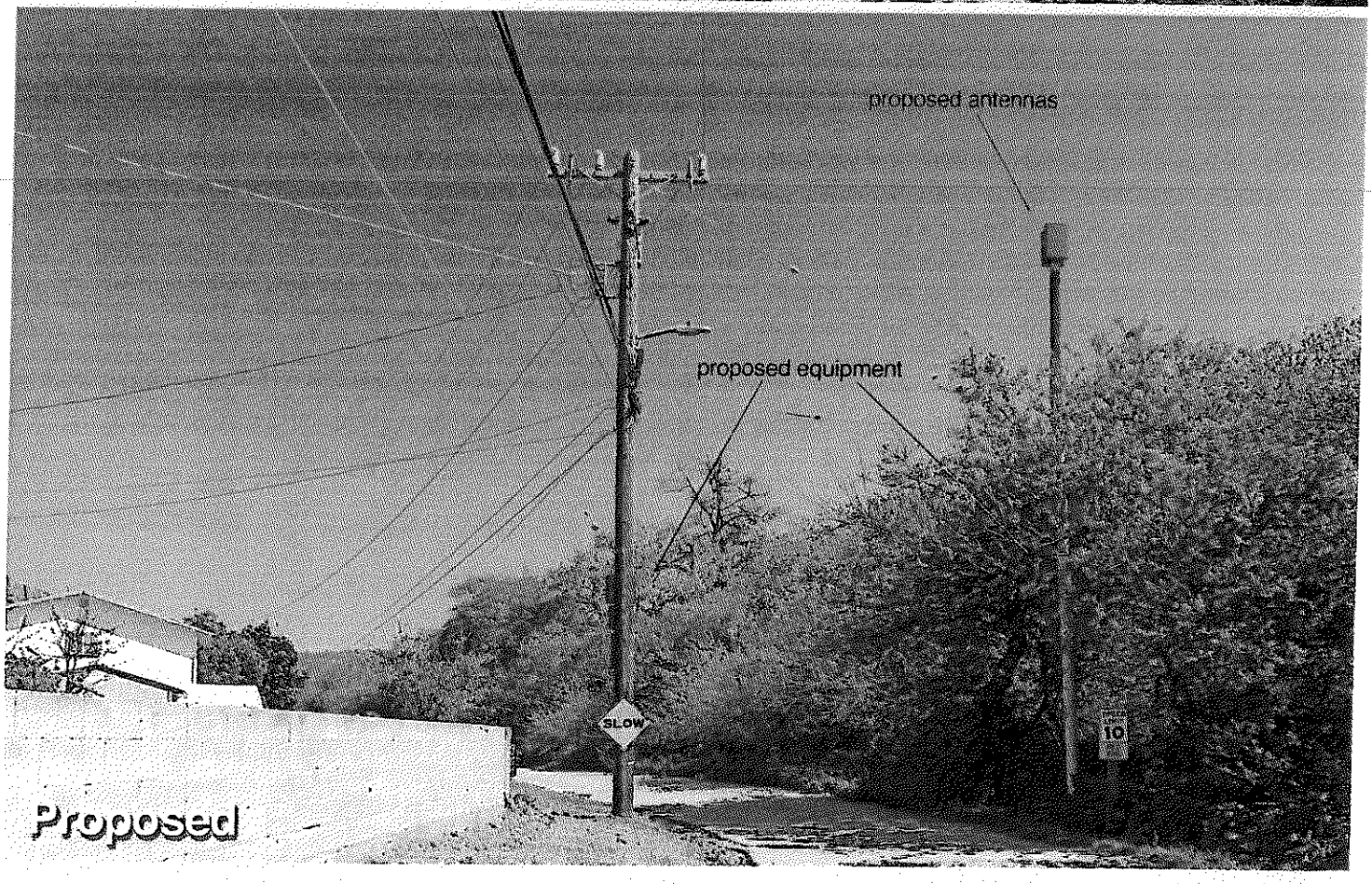
Across 231 San Vicente St
Davenport, CA

Looking Southwest from San Vicente Street

View #1

Applied Imagination 510 914-0500





CROWN CASTLE

9/16/17

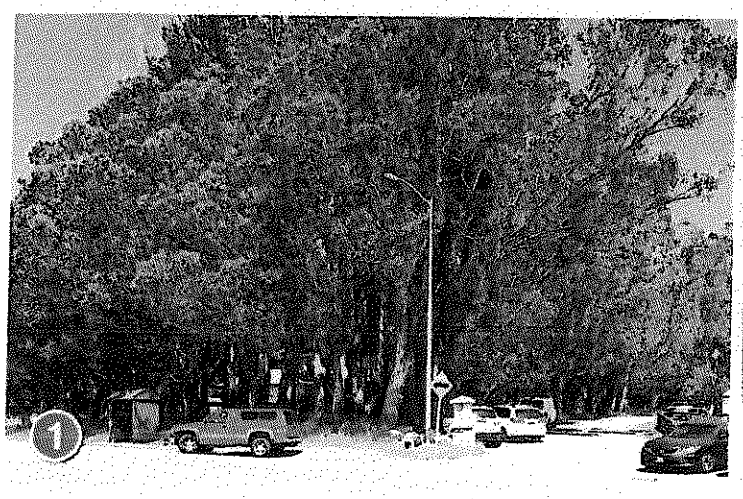
DAV-021m

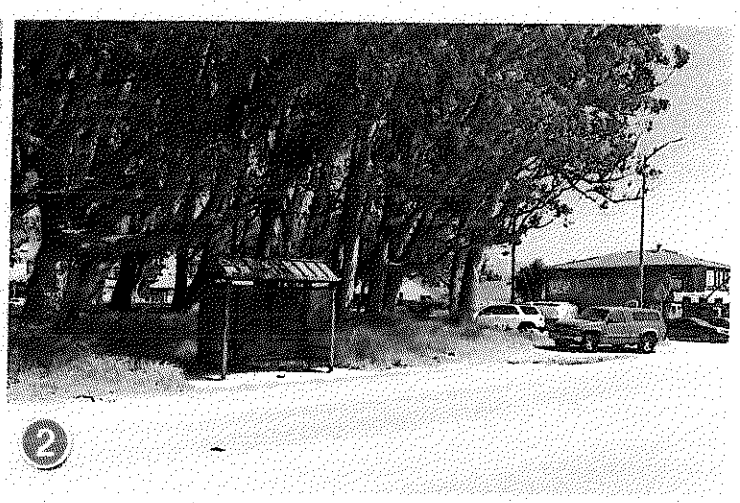
Across 231 San Vicente St
Davenport, CA

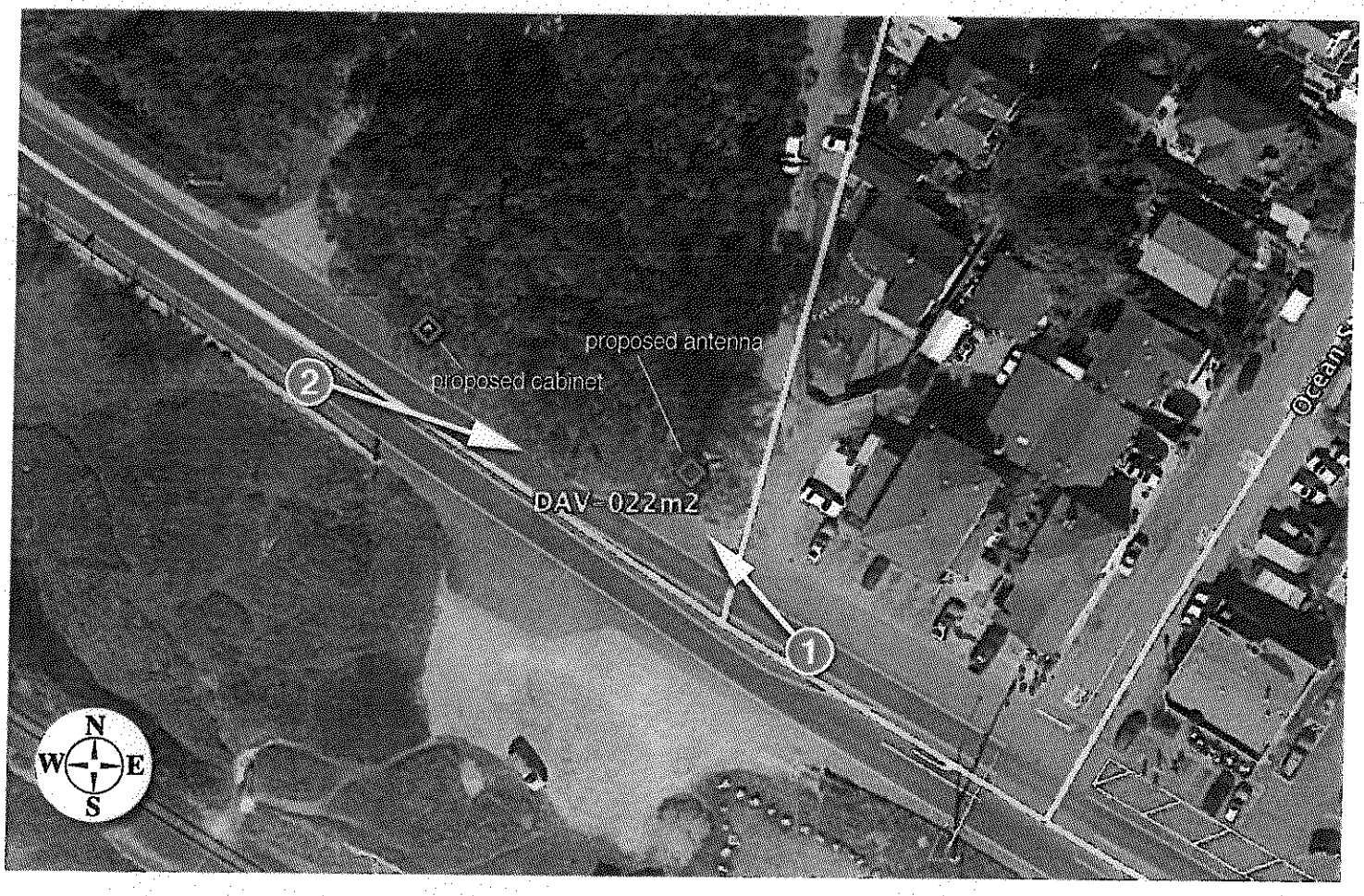
Looking Northeast from San Vicente Street

View #2

Applied Imagination 510 914-0500







CROWN CASTLE

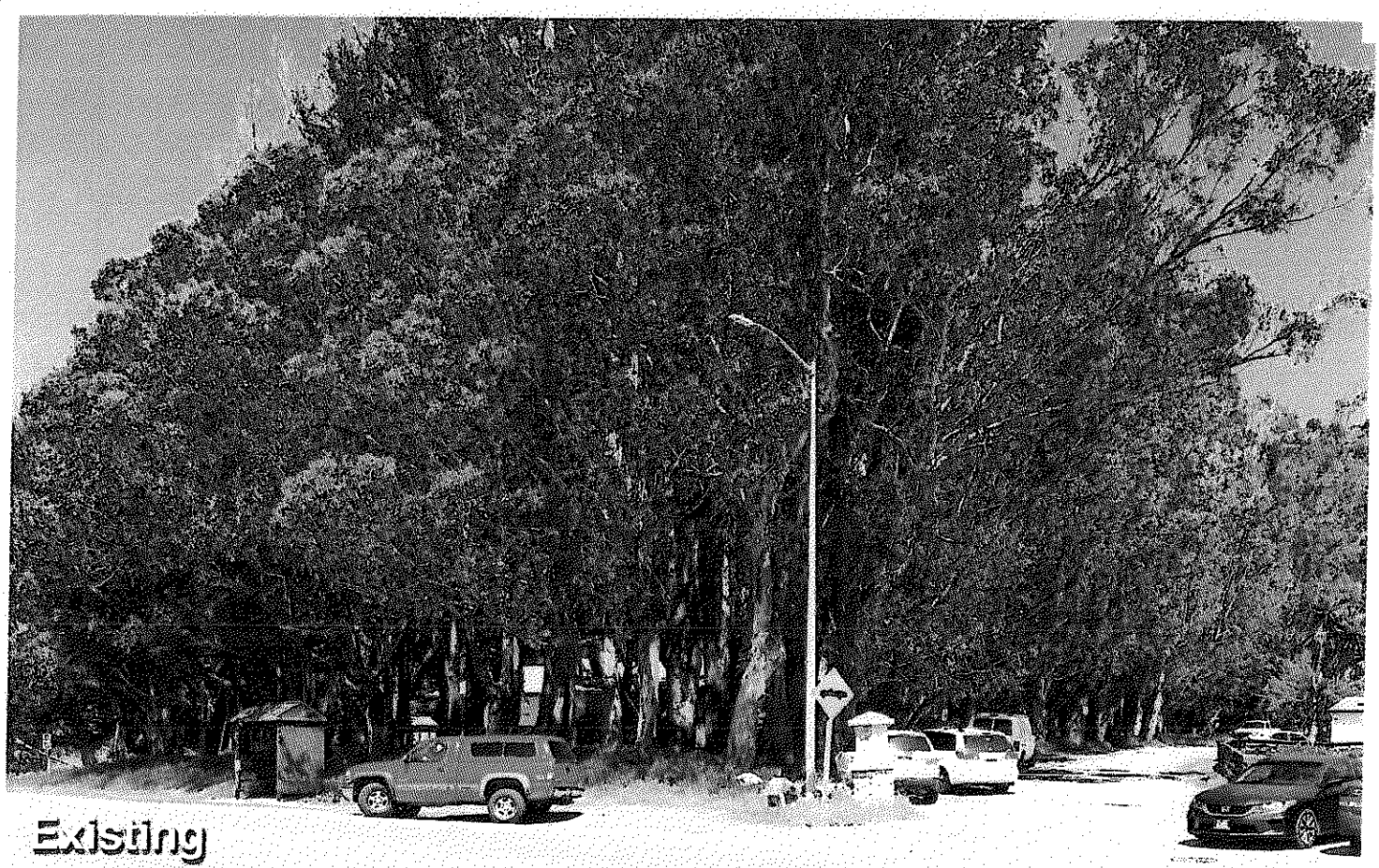
9/16/17

DAV-022m2 Pole to Match Tree Color Option

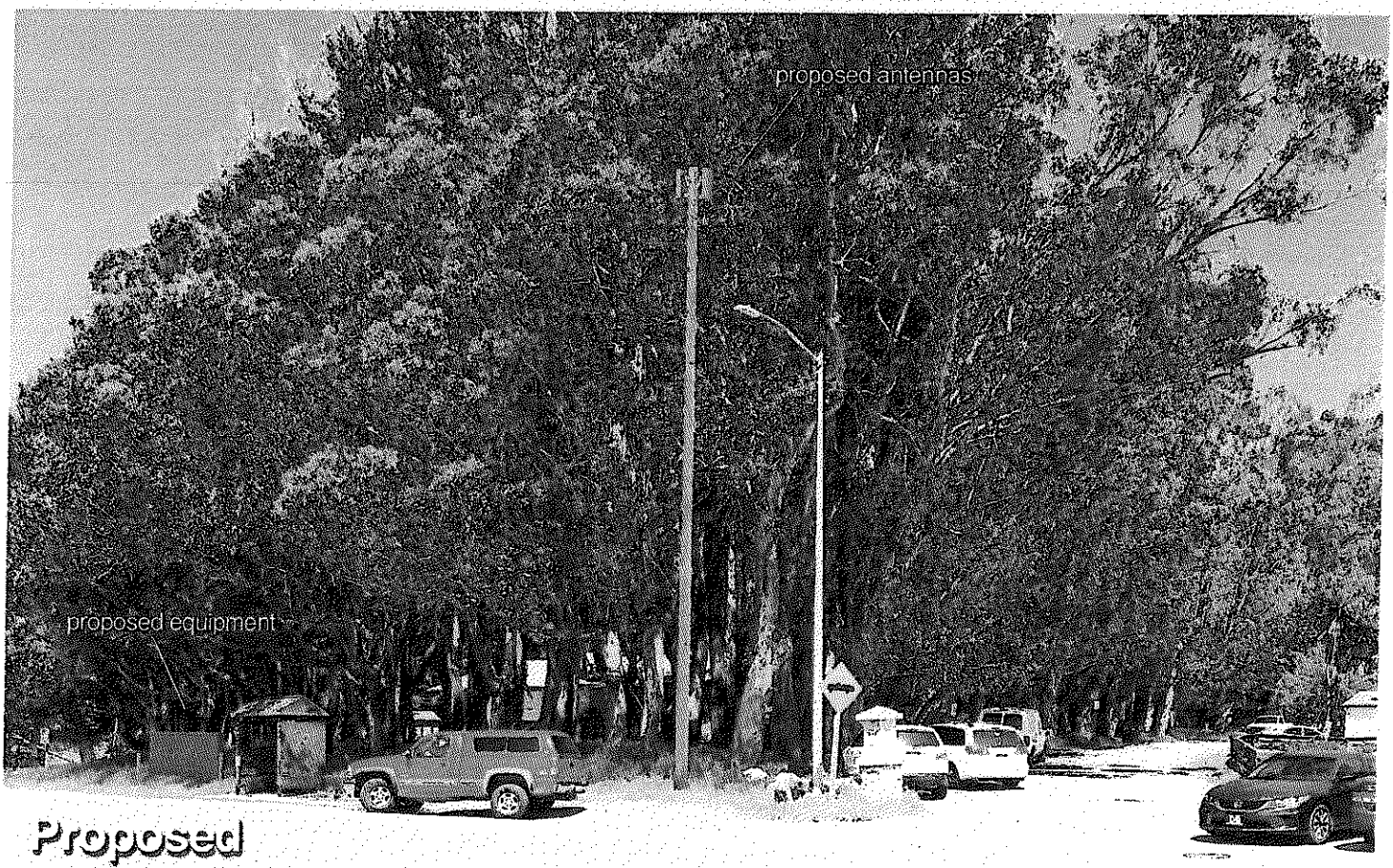
75 ft West of 500 Hwy 1
Davenport, CA

Aerial Map

Applied Imagination 510 914-0500



Existing



Proposed

CROWN CASTLE

9/16/17

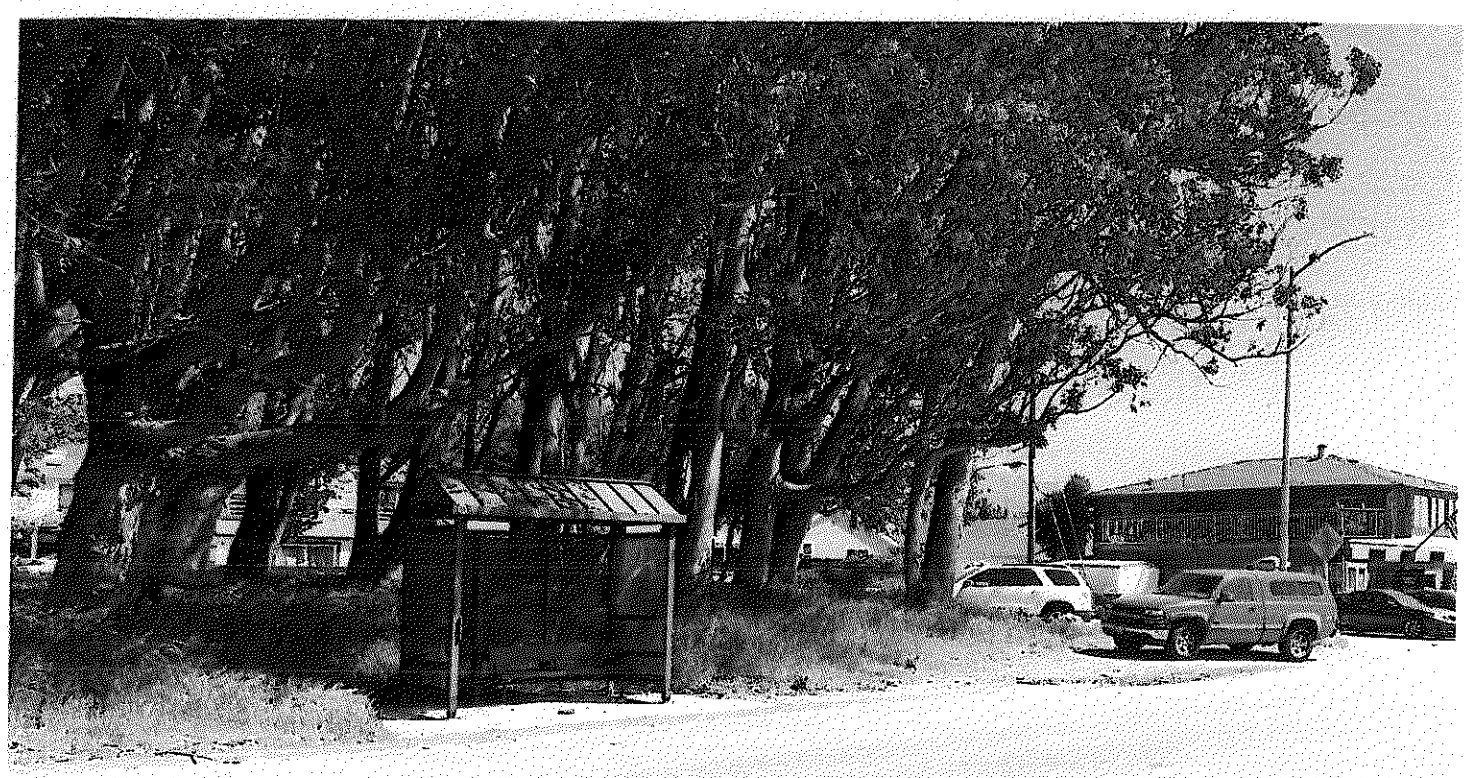
DAV-022m2 Pole to Match Tree Color Option

75 ft West of 500 Hwy 1
Davenport, CA

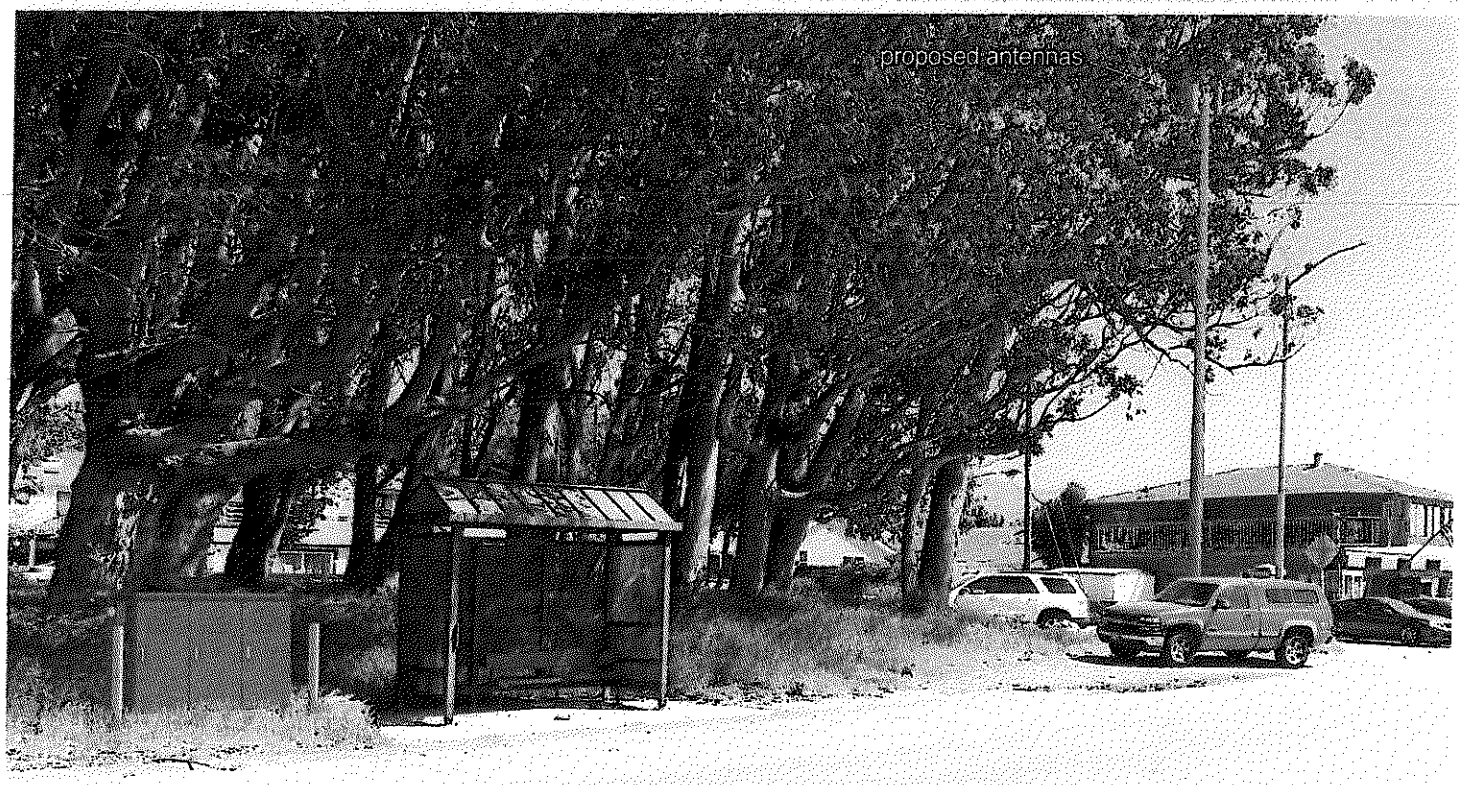
Looking Northwest from Hwy 1

View #1

Applied Imagination 510 914-0500



Existing



Proposed

CROWN CASTLE

9/16/17

DAV-022m2 Pole to Match Tree Color Option

75 ft West of 500 Hwy 1
Davenport, CA

Looking Northeast from Hwy 1

View #2

Applied Imagination 510 914-0500