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
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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 Matt Johnston of the Environmental Review staff at (831) 454-3201

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 Romero at (831) 454-3137 (TDD number (831) 454-2123 or (831) 763-8123) to make arrangements.

PROJECT: JUVENILE HALL SEED TO TABLE

APP #: N/A

APN(S): 061-371-16

PROJECT DESCRIPTION: Proposal to renovate and upgrade the existing juvenile hall, including upgrades to outdated kitchen and laundry facilities; septic system; renovation of existing day program rooms; heating and cooling improvements; construction of onsite greenhouse and garden plots; replacement of security fencing; and upgrades to building structural, electrical, mechanical, security, and fire and life safety systems.

PROJECT LOCATION: The project is located on the east side of Graham Hill Road, approximately one-half mile north of Lockewood Lane at 3650 Graham Hill Road. .

EXISTING ZONE DISTRICT: SU (Special Use)
APPLICANT: COUNTYH OF SANTA CRUZ, PROBATION DEPARTMENT
OWNER: COUNTY OF SANTA CRUZ
PROJECT PLANNER: Matt Johnston, (831) 454-3201
EMAIL: Matt.Johnston@santacruzcounty.us
ACTION: Mitigated Negative Declaration
REVIEW PERIOD: September 9, 2015 through October 8, 2015
This project will be considered at a public hearing by the Zoning Administrator. The date, time and location have not yet been set. When scheduling does occur, these items will be included in all public hearing notices for the project.

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MITIGATED NEGATIVE DECLARATION

Project: Juvenile Hall Seed to Table
APN(S): 061-371-16

Project Description: Proposal to renovate and upgrade the existing juvenile hall, including upgrades to outdated kitchen and laundry facilities; septic system; renovation of existing day program rooms; heating and cooling improvements; construction of onsite greenhouse and garden plots; replacement of security fencing; and upgrades to building structural, electrical, mechanical, security, and fire and life safety systems.

Project Location: The project site is located on the east side of Graham Hill Road, approximately one-half mile north of Lockewood Lane at 3650 Graham Hill Road.

Applicant: County of Santa Cruz, Probation Department

Owner: County of Santa Cruz

Staff Planner: Matt Johnston, (831) 454-3201 email: Matt.Johnston@santacruzcounty.us

This project will be considered at a public hearing by the Zoning Administrator at a date to be determined. 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 Negative Declaration Findings:

Find, that this 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 Negative Declaration and the comments received during the public review period, and; on the basis of the whole record before the decision-making body (including this Negative Declaration) that there is no substantial evidence that the project 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 8, 2015

Date: _____

_____
TODD SEXAUER, Environmental Coordinator
(831) 454-3511

NAME: Juvenile Hall Seed to Table
A.P.N: 061-371-16

NEGATIVE DECLARATION MITIGATIONS

In order to ensure that the impacts to sandhills habitat and the related sandhills species are reduced to less than significant levels, no disturbance shall take place until the conditions set forth in the required Habitat Conservation Plan and Incidental Take Permit, to be issued by the US fish and Wildlife Service, have been incorporated into the conditions of approval for County Grading Permit. These conditions must include either on-site restoration of sandhills habitat, purchase of credits through the Zayante Sandhills Conservation Bank, or some combination thereof.

In order to ensure impacts to the Santa Cruz Kangaroo Rat are reduced to less than significant, the following measures shall be included in the conditions of approval for the required development permit:

a) Restrict construction to daylight hours (½ hour after sunrise to ½ hour prior to sunset) to avoid SCKR, which are not active above ground during this time.
b) Restrict vehicle traffic to the greatest degree possible. Use temporary fencing and signage during the period of construction to prevent vehicles from entering sandhills habitats.
c) Prior to ground disturbance for the fence replacement project a burrow search and live-trapping should be conducted in potential SCKR habitat. Depending on whether burrows are present within or near the project footprint, potential mitigations could include avoidance, housing captured SCKR in captivity until the project is completed in a given area, and release of SCKR into artificial burrows.
d) If trenches are to be left unfilled overnight, they should either be completely covered with plywood sheets or provided with escape ramps every 100 feet.
e) Trenches should be checked prior to work each morning by a biological monitor to ensure that no kangaroo rats have been trapped. Any trapped kangaroo rats should be removed from the trench.

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CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ENVIRONMENTAL REVIEW INITIAL STUDY

Date: August 24, 2015

Staff Planner: Matt Johnston

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: County of Santa Cruz Probation Department

APN: 061-371-16

OWNER: County of Santa Cruz

SUPERVISORIAL DISTRICT: Fifth

PROJECT LOCATION: The property is located on the east side of Graham Hill Road, approximately one-half mile north of Lockewood Lane at 3650 Graham Hill Road.

SUMMARY PROJECT DESCRIPTION:

Proposal to renovate and upgrade the existing juvenile hall, including upgrades to outdated kitchen and laundry facilities; septic system; renovation of existing day program rooms; heating and cooling improvements; construction of onsite greenhouse and garden plots; replacement of security fencing; and upgrades to building structural, electrical, mechanical, security, and fire and life safety systems.

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.

- ☐ Geology/Soils
- ☐ Hydrology/Water Supply/Water Quality
- ☒ Biological Resources
- ☐ Agriculture and Forestry Resources
- ☐ Mineral Resources
- ☐ Visual Resources & Aesthetics
- ☐ Cultural Resources
- ☐ Hazards & Hazardous Materials
- ☐ Noise
- ☐ Air Quality
- ☐ Greenhouse Gas Emissions
- ☐ Public Services
- ☐ Recreation
- ☐ Utilities & Service Systems
- ☐ Land Use and Planning
- ☐ Population and Housing

☐ Transportation/Traffic

☐ Mandatory Findings of Significance

DISCRETIONARY APPROVAL(S) BEING CONSIDERED:

☐ General Plan Amendment
☐ Land Division
☐ Rezoning
☒ Development Permit
☐ Coastal Development Permit
☒ Grading Permit
☐ Riparian Exception
☐ Other:

NON-LOCAL APPROVALS

Other agencies that must issue permits or authorizations: US Fish & Wildlife (Incidental Take Permit)

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

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Matt Johnston
Environmental Coordinator

8/27/2015
Date

II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS

Parcel Size: 27.88 acres
Existing Land Use: public facility (County Juvenile Hall)
Vegetation: native evergreen and oak trees and shrubs
Slope in area affected by project: ☒ 0 - 30% ☐ 31 – 100%
Nearby Watercourse: Bean Creek
Distance To: 3,500 feet north

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

Water Supply Watershed: yes
Groundwater Recharge: Yes
Timber or Mineral: mapped timber
Agricultural Resource: no
Biologically Sensitive Habitat: Sandhills
Fire Hazard: mapped high hazard area
Floodplain: no
Erosion: n/a
Landslide: not a mapped hazard
Liquefaction: low

Fault Zone: no
Scenic Corridor: yes
Historic: no
Archaeology: not a mapped resource
Noise Constraint: none
Electric Power Lines: no
Solar Access: good
Solar Orientation: good
Hazardous Materials: no

SERVICES

Fire Protection: Scotts Valley
School District: Santa Cruz

Sewage Disposal: private septic

Drainage District: Zone 4
Project Access: driveway from Graham Hill Road
Water Supply: San Lorenzo Valley Water

PLANNING POLICIES

Zone District: SU (Special Use)
General Plan: Public Facility, Mountain Residential

Special Designation: none

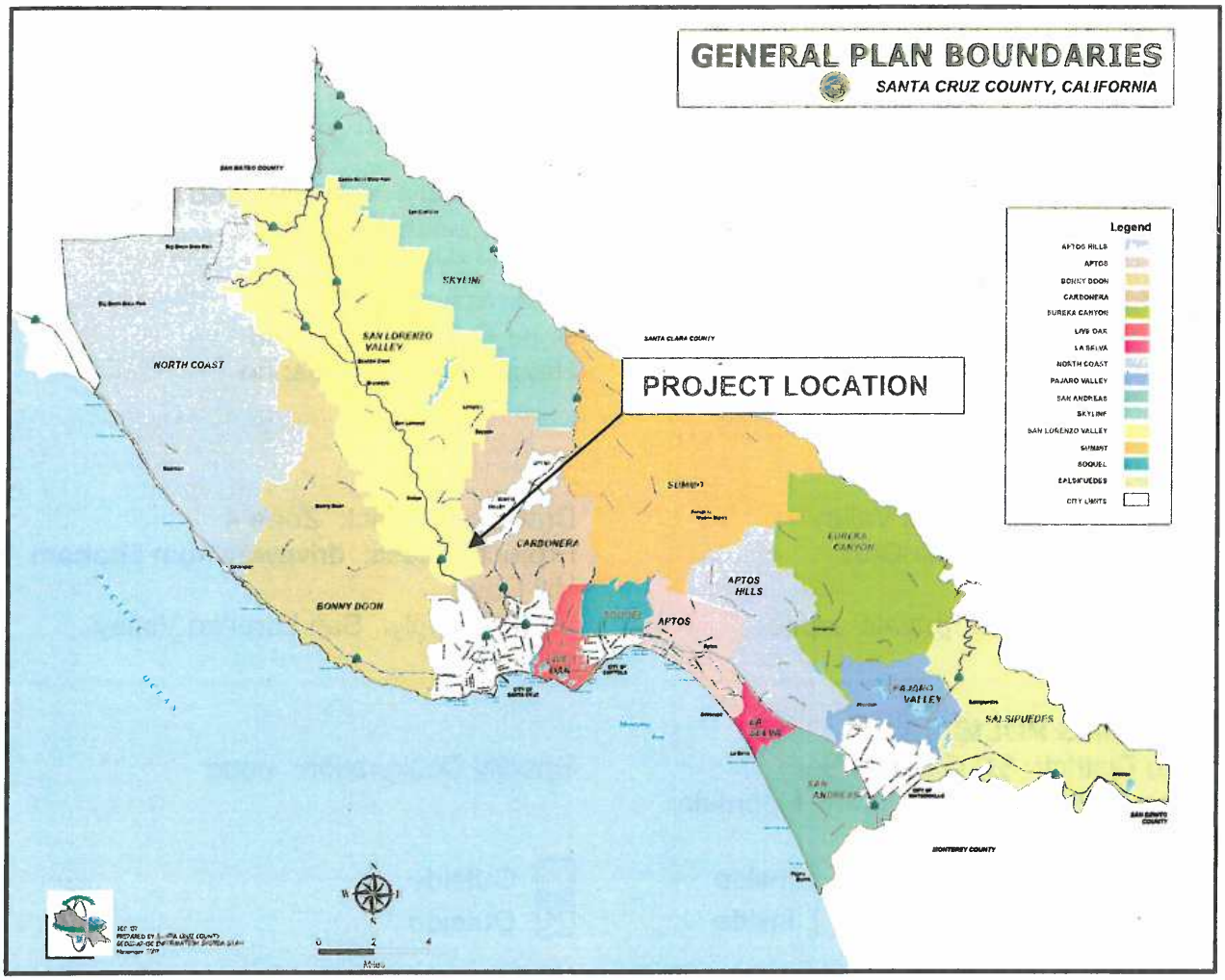
Urban Services Line:	☐ Inside	☒ Outside
Coastal Zone:	☐ Inside	☒ Outside

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

The project area is within the existing Juvenile Hall facility, including the existing fence line and septic tank. The facility is surrounded on the north and east by intact dense Sandhills parkland habitat, to the south by a developed county park, and to the west by the facility parking lot. Other areas of the subject parcel support Sandhills chaparral and ponderosa pine forest communities with dense litter and canopy cover. The yard area that is the proposed location for the new garden area contains a concrete pad and a desiccated planted lawn with two ornamental trees. The project area features Zayante

sand soils, and within the unpaved portion, the soils are somewhat compacted and covered in some areas with non-native rock and mulch.

The Hanson Quarry Conservation Area is approximately 800 feet northeast of the project area on an adjacent parcel. Unimproved chaparral and pine forested land owned by the Mt. Hermon Association is west of the subject property, and the unimproved land on the south side of Graham Hill Road across from the project site is State Parks land.



PROJECT BACKGROUND:

The Juvenile Hall on the project site was originally constructed in 1968. A baseball field (Michael Gray Field), used by the community, was added to the property, southeast of the Juvenile Hall facility, in 1986. On December 22, 1992, Permit # 92-0615 (a Commercial Development Permit, Grading Permit and Master Site Plan) was approved to allow for the subsequent construction of a 4,200 square foot addition to the facility that included a courtroom and associated offices. On September 27, 1993, Permit # 93-

0446 (Amendment to # 92-0615) was approved to allow for the installation of two pre-fabricated buildings in order to expand the residential treatment program from 12 to 18 children. On June 25, 2013, Permit # 131090 was approved to allow the construction of an indoor recreational facility in order to comply with state-mandated requirements; the facility is currently awaiting a permit from the Federal Fish and Wildlife Service and is expected to be constructed this year.

The total gross area of the Santa Cruz Juvenile Hall is 18,039 square feet. The facility houses both male and female youthful offenders.

The County of Santa Cruz was approved for a financing award by the California Board of State and Community Corrections (BSCC) for the implementation of new "Seed to Table" juvenile rehabilitative programming along with needed renovation and upgrades to the Santa Cruz County Juvenile Hall. This award was granted under the Senate Bill 81 Round Two Local Youthful Offender Rehabilitative Facility Construction Financing Program (SB81-R2).

The new "Seed to Table" culinary and horticultural program at the existing juvenile hall facility will include education and skill building in cooking, culinary arts, business management, production of healthy food, science, horticulture and master gardening. Programming will incorporate partnerships with local colleges and agribusiness for educational, business and vocational training and community exposure to help youth with reentry. Similar innovative programs across California and the nation have experienced very favorable results in reducing crime recidivism rates.

The primary goals of the program include: 1) Improving overall conditions of confinement and providing youth in detention with further educational, employment, and skill building opportunities through rehabilitative programming; 2) Providing appropriate space for master gardening, culinary arts, recreational, educational, and rehabilitative activities for in-custody youth; and 3) Implementing a state of the art culinary and horticulture rehabilitative program that introduces youth to service providers and employment opportunities in their community to enhance educational and employment opportunities upon reentry and reduce recidivism.

DETAILED PROJECT DESCRIPTION:

The project includes the following elements:

- Renovate kitchen w/new appliances, layout and safety provisions, including replacement appliances, replacement walk-in refrigerator and freezer, cover exposed electrical wiring and plumbing for detention security and safety purposes, provide locked area for knives and other restricted items, and installation of an HVAC cooling system in the kitchen.
- Renovate the dining area to respond to kitchen changes.
- Remodel kitchen dry food storage area to accommodate kitchen remodel and to improve functioning, provide chef office space with view to kitchen, and renovate existing bathroom in back hall to meet accessibility codes.

- Provide gardening plots and greenhouse for seedlings, etc.
- Install rainwater harvesting barrels and drainage system from flat roof
- Include raised garden beds, composting and vermiculture bins, tool shed, and formal paths for access.
- Replace perimeter fencing with high quality detention security fence.
- Upgrade two day-rooms (program rooms) with new flooring, security upgrades to windows and library area to accommodate new programming.
- Upgrade existing laundry facility with new higher capacity appliances.
- Upgrade building, accessibility, structural, seismic and fire and safety improvements as needed to comply with current building, Title 24 and Title 15 detention facility codes.
- Upgrade lighting systems throughout remodeled areas to LED lighting for energy efficiency.
- Provide new cameras as needed throughout remodeled (new program) areas and add computer storage capacity to meet or exceed the new laws of minimum retention time.
- Replace doors (to open to the outside) and locks for 20 sleeping rooms on unit wings for safety.
- Add metal detector unit at entry into Juvenile Hall portion of building for program and family visits.
- Replace sliding door and windows in probation offices with security door for safety from gardening area.
- Expand electrical panel and/or generator capacity.
- Upgrade security measures throughout juvenile hall in areas related to this programming as needed, including an upgrade to the control center for improved security purposes.
- Repave or re-slurry upper parking lot on east side of lobby by Probation offices and improve lighting to enhance safety for program visits.
- Upgrade septic system by replacing existing septic tanks with alternative systems.
- Provide new HVAC or air flow cooling system throughout Juvenile Hall.

III. ENVIRONMENTAL REVIEW CHECKLIST

A. GEOLOGY AND SOILS

Would the project:

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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). However, the project site is located approximately eight miles southwest of the San Andreas fault zone, approximately nine and one-half miles northeast of the Palo Colorado/San Gregorio fault zone and approximately four and one-half miles 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 project includes upgrading building, accessibility, structural, seismic and fire and safety improvements as needed to comply with current building,

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

Title 24 and Title 15 detention facility codes, 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 as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? ☐ ☐ ☐ ☒

Discussion: The proposed project will not affect the foundations of any existing buildings, which have been found to meet existing Title 24 and Title 15 detention facility codes. There is no expected impact as a result of this project.

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 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, which will specify detailed erosion and sedimentation control measures. The plan will include provisions for disturbed areas to be planted with ground cover and to be maintained to minimize surface erosion.

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: A geotechnical report was produced for a new gym on the subject parcel, by Haro, Kasunich & Associates, Inc. dated 4/13. It found subsurface conditions that include loose to dense silty sand soils with some compressibility, but did not identify expansive soil conditions.

6. Place sewage disposal systems in areas dependent upon soils incapable of adequately supporting the use of septic tanks, leach fields, or alternative ☐ ☐ ☐ ☒

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

waste water disposal systems where sewers are not available?

Discussion: The proposed project can continue to use the existing onsite sewage disposal system that is permitted by County Environmental Health Services, as there will be no expansion of use related to this project and the system is functioning properly. The proposed project does include an upgrade in the system to the use of an alternative system specific to course sandy soils. This is a beneficial 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.

B. HYDROLOGY, WATER SUPPLY, AND WATER QUALITY
Would the project:

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

Discussion: According to the Federal Emergency Management Agency (FEMA) National Flood Insurance Rate Map, dated March 2, 2006, no portion of the project site lies within a 100-year flood hazard area.

2. 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 March 2, 2006, no portion of the project site lies within a 100-year flood hazard area.

3. Be inundated by a seiche, tsunami, or mudflow? ☐ ☐ ☐ ☒

Discussion: The project site is not in a location that would be subject to a seiche, tsunami or mudflow due to its substantial distance from any bodies of water or land contours that could potentially allow for inundation.

4. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer ☐ ☐ ☒ ☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 Juvenile Hall facility currently obtains water from San Lorenzo Valley Water. The addition of a small garden will use less water than the existing lawn area requires, and therefore will not impact water supplies. The project includes a drip irrigation system and a rainwater catchment system to augment the water for the garden, further reducing water demand.

5. Substantially degrade a public or private water supply? (Including the contribution of urban contaminants, nutrient enrichments, or other agricultural chemicals or seawater intrusion).	☐	☐	☒	☐

Discussion: While there is a well serving the San Lorenzo Valley Water District on site, there is no indication that runoff from the roof of the proposed structure would substantially degrade groundwater quality. The project would not discharge runoff directly into a public or private water supply, and no commercial or industrial activities are proposed that would generate a substantial amount of contaminants. Potential siltation from construction of the proposed project will be addressed through implementation of erosion control measures.

6. Degrade septic system functioning?	☐	☐	☐	☒

Discussion: County Environmental Health has reviewed the proposed project, and there is no indication that existing septic systems in the vicinity would be affected by the project.

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

Discussion: The proposed project is not located near any watercourses, and would not alter the existing overall drainage pattern of the site. Department of Public Works Drainage Section staff has reviewed and approved the proposed drainage plan.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒

Discussion: No new runoff will be produced as a result of this project. The installation of a rainwater catchment system will further reduce the existing runoff and will retain the water for garden use. This is a beneficial impact.

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: There are no levees or dams in the vicinity of the project site.

10. Otherwise substantially degrade water quality?	☐	☐	☐	☒

Discussion: The project would not result in any impacts from use or release of urban pollutants.

C. BIOLOGICAL RESOURCES

Would the project:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game, or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Discussion:

The subject parcel supports special-status plants and animals that occur within the Santa Cruz Sandhills—an ecosystem that occurs on Zayante sand soil within central Santa Cruz County. A Biotic Assessment was prepared for this project by Jodi McGraw, dated 8/7/15 (Attachment 1). Based on survey results and observations of the habitat conditions within the proposed project area, and known information about the distribution and ecology of the special-status species, the proposed new improvements to the Juvenile Detention Center will likely impact the Mount Hermon June beetle. Individuals that occur underground can be killed during soil excavation for

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

the fence and wastewater treatment system upgrade. The project will also impact the species by permanently covering habitat within the portion of open soil within the project disturbance envelopes, such as through installation of the garden facilities (greenhouses and raised beds), fence footings and piers, and additional pavement, if any, in the parking area. Approximately 10-15% of the proposed project area features asphalt (parking area and eastern access road) or concrete (utility area) which already precludes use of habitat below by the Mount Hermon June beetle. Much of the unpaved areas including the dirt portion of the access route contain habitat that has been degraded by soil compaction and vegetation modifications associated with use of the property. Portions of the project area include relatively intact habitat characterized by loose sand soil and native plant cover.

Removal of trees associated with the wastewater treatment upgrades and parking area enhancement would further impact the species by reducing roots upon which it feeds. The project improvements also have the potential to indirectly impact Mount Hermon June beetle, by promoting the invasion and spread of exotic plants that can be facilitated by disturbance. The nocturnal beetles can also be impacted if the project improvements increase the size, number, or frequency of use of outdoor night lighting, which attracts male beetles and disrupts breeding. These impacts could reduced by utilizing night lights that emit wavelengths that do not attract nocturnal insects.

The projects may also impact silverleaf manzanita, individuals of which may be killed as a result of work to replace the fence. Such impacts could potentially be avoided if the plants are flagged for avoidance by crews when installing the fence. Silverleaf manzanita could also be impacted as a result of construction along the access road, though such impacts could similarly be avoided by installing fences to prevent off-road vehicle use.

Construction fences would similarly likely be sufficient to avoid impacts to Ben Lomond spineflower along the access road. Fences or symbolic fencing could also be used to alert crews to the population west of the SLVWD's well, should foot travel need to occur in that area as part of work to install the fence.

Impacts the other rare and endangered plants and animals of the Sandhills do not occur within or adjacent to the project footprint, the project is not anticipated to impact the Zayante band-winged grasshopper, Ben Lomond wallflower, or Ben Lomond buckwheat.

The U.S. Fish and Wildlife Service (USFWS) administers the Federal Endangered Species Act and can permit take of the endangered insect that might occur incidentally during the course of otherwise lawful projects by issuing what is known as an "incidental take permit" (ITP).

To establish the best mitigations and to receive an ITP for the project, a proposal for a Habitat Conservation Plan (HCP) and Incidental Take Permit Application prepared by Jodi McGraw Consulting has been submitted. Under the HCP/ITP proposal, Biologist McGraw will prepare a memo outlining the anticipated qualitative and quantitative impacts of the project upon the MHJB. Alternative approaches to project mitigations

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

will be fully explored, to include both onsite habitat restoration and off-site mitigations.

The remainder of the subject parcel contains high quality sandhills parkland habitat, and has been the subject of several mitigation efforts for unrelated projects. Further opportunities for on-site mitigation exist, and would include long-term exotic plant removal and vegetative management developed specifically for enhancement of the Sandhills ecosystem.

Impacts to the MHJB can also be mitigated by providing permanent protection and management of Sandhills habitat off-site through the purchase of conservation credits which correspond to the area (in square footage) of impacted Sandhills habitat. The Zayante Sandhills Conservation Bank was created and approved by the USFWS and the County of Santa Cruz to provide options for mitigation for small projects that impact degraded Sandhills habitat such as the area of disturbance affected by the proposed project. The purchase of credits in the Ben Lomond Sandhills preserve results in the protection in perpetuity of prime habitat. The HCP and ITP will also describe measures to avoid or minimize construction-related impacts to the MHJB and their larvae, including but not limited to the timing of construction, covering soils and specific lighting requirements.

As the primary agency entrusted with the protection of the MHJB, the USFWS will determine the appropriate mitigation for the impacts to the MHJB habitat. This mitigation will either be through the purchase of credits or the restoration of habitat on site, or some combination thereof. In order to ensure that the impacts to the MHJB and Sandhills habitat are reduced to less than significant, the conditions set forth in the HCP and ITP shall become conditions of approval of the grading permit required by the County Planning Department.

In addition to the species listed above, the property is known to support the Santa Cruz Kangaroo Rat (SCKR), which is restricted to a very small range in the foothills of the Santa Cruz Mountains in Santa Cruz County, California. The subspecies generally occurs in association with northern maritime chaparral habitats on inland marine sand deposits of the Zayante soil series. Although the subspecies is not designated as a Species of Special Concern, CDFW includes it in its Special Animals List, and ranks the subspecies as being critically imperiled due to very low numbers of populations.

Based on a separate site assessment and trapping results (Attachment 2), the only project element with the potential to directly impact SCKR is the fence replacement. The other proposed actions will take place on the interior of the buildings, or in outdoor areas that are highly disturbed and/or do not support sandhills habitats. The fence replacement project will involve digging a trench along the alignment, at least 5' deep and 18" wide, which will be used to form a concrete foundation. The fence, which will be anchored into the foundation, will be 16 ½ feet tall. Digging the trench could crush burrows or kill or injure SCKR in their burrows, if present. SCKR could become trapped in the trench if it remains open at night. In the long term, the presence of the concrete foundation represents a loss of burrowing habitat. Also, given that the species is utilizing at least some of the interior of the facility in the northwest corner of the site, replacement of a fence with tighter mesh could impede movements of the SCKR.

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

SCKR habitat is also present along the access route for the fence replacement project. The road is used regularly by San Lorenzo Valley Water District personnel, and the additional traffic resulting from the project is considered negligible. However, measures should be taken to ensure that project vehicles do not disturb adjacent sandhills habitats.

In order to reduce potential impacts to the SCKR to less than significant, the following measures shall be implemented:

- Restrict construction to daylight hours (½ hour after sunrise to ½ hour prior to sunset) to avoid SCKR, which are not active above ground during this time.
- Restrict vehicle traffic to the greatest degree possible. Use temporary fencing and signage during the period of construction to prevent vehicles from entering sandhills habitats.
- Prior to ground disturbance for the fence replacement project, a burrow search and live-trapping should be conducted in potential SCKR habitat. Depending on whether burrows are present within or near the project footprint, potential mitigations could include avoidance, housing captured SCKR in captivity until the project is completed in a given area, and release of SCKR into artificial burrows.
- If trenches are to be left unfilled overnight, they should either be completely covered with plywood sheets or provided with escape ramps every 100 feet.
- Trenches should be checked prior to work each morning by a biological monitor to ensure that no kangaroo rats have been trapped. Any trapped kangaroo rats should be removed from the trench.

2.	Have a substantial adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations (e.g., wetland, native grassland, special forests, intertidal zone, etc.) or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Discussion: See C-1 above.

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

Discussion: The proposed project does not involve any activities that would interfere with the movements or migrations of fish or wildlife, or impede use of a known wildlife

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

nursery site. There are no waterways on the site, and much of the 27.88 acre site is open and undeveloped, with no impediments to migratory wildlife corridors or nursery sites. The proposed improvements are clustered within the previously developed area within the site. The replacement fence will maintain the existing fence line.

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

Discussion: The proposed project may involve new exterior lighting along the new fence. As a condition of the HCP, this lighting will be required to be shielded away from the habitat and towards the yard and building areas. It will also use a frequency light wavelength less likely to attract insects. This will reduce potential impacts to less than significant.

5.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

Discussion: There are no federally protected wetlands as defined by Section 404 of the Clean Water Act in the vicinity of the project.

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)?	☐	☒	☐	☐

Discussion: The project would conflict with the requirements of the County of Santa Cruz Sensitive Habitat Ordinance (County Code Chapter 16.32) if the potential incidental take of Mount Hermon June Beetles is not mitigated. However, a Habitat Conservation Plan (HCP) to address and mitigate potential impacts to Sandhills habitat will be incorporated into the project, and a US Fish and Wildlife Incidental Take Permit obtained, as described under C-1.

7.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional,	☐	☐	☒	☐

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

or state habitat conservation plan?

Discussion: A Habitat Conservation Plan (HCP) to address and mitigate potential impacts to Sandhills habitat is required and will be incorporated into the project, and a US Fish and Wildlife Incidental Take Permit must be obtained, as described under C-1.

D. AGRICULTURE AND FOREST RESOURCES

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

1.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

Discussion: The project site does not contain any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. In addition, the project does not contain Farmland of Local Importance. 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: The project site is zoned Special Use (SU), which is not considered to be an agricultural zone. Additionally, the project site's land is not under 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.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 adjacent to land designated as Timber Resource.

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

Discussion: The proposed improvements will be sited in an already disturbed open area. No impact to forest lands 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 project site and surrounding area does not contain any lands designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide, or Farmland of Local Importance would be converted to a non-agricultural use. In addition, the proposed area of disturbance within the project site contains no forest land, and there would be no impacts to forested areas of the project site. Therefore, no impacts are anticipated.

E. MINERAL RESOURCES

Would the project:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

Discussion: The site does not contain any known mineral resources that would be 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	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				

Discussion: The project site is zoned Special Use (SU), which 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.

F. VISUAL RESOURCES AND AESTHETICS

Would the project:

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

Discussion: Although Graham Hill Road is a scenic resource as designated in the County's General Plan (1994), public views of the existing Juvenile Hall structure, topography, trees and other landscaping will not change. The entire Juvenile Hall development on the site is set back more than 600 feet from the edge of Graham Hill Road.

2. Substantially damage scenic resources, within a designated scenic corridor or public view shed area including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

Discussion: The project site is located along a County designated scenic resource (Graham Hill Road), but most of the proposed development will be situated either behind the existing Juvenile Hall structures, or within the existing buildings. Therefore, no impact is anticipated.

3. Substantially degrade the existing visual character or quality of the site and its surroundings, including substantial change in topography or ground surface relief features, and/or development on a ridgeline?	☐	☐	☒	☐

Discussion: See F-2 above.

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

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

area?

Discussion: While the new exterior lighting may contribute an incremental amount of night lighting to the visual environment, it is a substantial distance from any public or private views. However, the project would be conditioned to require that new outdoor lighting, if any, would be shielded, non-glare and low wattage in order to reduce this potential impact to a less than significant level.

G. CULTURAL RESOURCES

Would the project:

1.	Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	☐	☐	☐	☒

Discussion: The existing structures on the property are not designated as a historic resource on any federal, state or local inventory.

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

Discussion: No archeological resources have been identified in the project area. Pursuant to County Code Section 16.40.040, if at any time in the preparation for or process of excavating or otherwise disturbing the ground, any human remains of any age, or any artifact or other evidence of a Native American cultural site which reasonably appears to exceed 100 years of age are discovered, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in County Code Chapter 16.40.040.

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

Discussion: Pursuant to Section 16.40.040 of the Santa Cruz County Code, if at any time during site preparation, excavation, or other ground disturbance associated with this project, human remains 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	☐	☐	☐	☒

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

unique geologic feature?

Discussion: No paleontological resources or unique geologic features have been identified in the project area.

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: A May 15, 2015, Forensic Analytical Laboratories report regarding the makeup of the ceiling tiles at the Juvenile Detention Facility (Attachment 3) determined that there was no asbestos present in the ceiling tile. The upgrades to the facility will not involve the use of hazardous materials, substances or waste.

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: The upgrades to the facility will not involve the use of hazardous materials, substances or waste.

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: The Graham Hill Juvenile Hall is not within ¼ mile of any school.

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 Environmental Health Department's list of hazardous sites in Santa Cruz County compiled pursuant to the specified code.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 an airport land use plan area or within two miles of a public airport or public use airport.

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 within an airport land use plan area or within the vicinity of a private airstrip.

7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Discussion: The proposed project will not generate any new traffic to or from the Juvenile Hall facility, and is not a part of any adopted emergency response plan or evacuation plan.

8. Expose people to electro-magnetic fields associated with electrical transmission lines?	☐	☐	☐	☒

Discussion: There are no high-power electrical transmission lines in the vicinity of the proposed project, nor are any proposed as part of the project.

9. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Discussion: The project design incorporates all applicable fire safety code requirements and includes fire protection devices as required by the local fire agency.

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

I. TRANSPORTATION/TRAFFIC

Would the project:

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

Discussion: There would be no impact because no additional traffic would be generated.

2.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

Discussion: There would be no impact because the project would not generate any air traffic.

3.	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 would not include hazardous design features or incompatible uses.

4.	Result in inadequate emergency access?	☐	☐	☐	☒

Discussion: The project's road access meets County standards and has been approved by the local fire agency.

5.	Cause an increase in parking demand which cannot be accommodated by existing parking facilities?	☐	☐	☐	☒

Discussion: The proposed project will not increase the use of the Juvenile Hall facility beyond its existing levels, which currently meets the code requirements for the

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

required number of parking spaces.

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 would have no impact on current roads or transportation patterns.

7.	Exceed, either individually (the project alone) or cumulatively (the project combined with other development), a level of service standard established by the County General Plan for designated intersections, roads or highways?	☐	☐	☐	☒

Discussion: There would be no impact because no additional traffic would be generated.

J. NOISE

Would the project result in:

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

Discussion: The project may create a small incremental increase in the existing noise environment with the installation or upgrade of the air conditioning system. However, because the project is located within a large parcel at a great distance from any sensitive receptors, there will be no significant noise impacts.

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

Discussion: The project would not generate any groundborne vibration or noise.

3.	Exposure of persons to or generation of noise levels in excess of standards established in the General Plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒

Discussion: Per County policy, average hourly noise levels shall not exceed the

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

General Plan threshold of 50 L_{eq} during the day and 45 L_{eq} during the nighttime. Impulsive noise levels shall not exceed 65 db during the day or 60 db at night. These levels would not be exceeded, and there are no nearby sensitive receptors.

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

Discussion: Noise generated during construction would increase the ambient noise levels for adjoining areas. Construction would be temporary, however, and given the limited duration of this impact and isolated nature of the facility it is considered to be less than significant.

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 located within an airport land use plan area or within two miles of a public airport or public use airport.

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 located within the vicinity of a private airstrip.

K. AIR QUALITY

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

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

Discussion: The North Central Coast Air Basin does not meet state standards for ozone and particulate matter (PM_{10}). Therefore, the regional pollutants of concern that would be emitted by the project are ozone precursors (Volatile Organic Compounds [VOCs] and nitrogen oxides [NO_x]), and dust.

No new traffic would be generated by the project and there is no indication that new

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

emissions of VOCs or NO_x would exceed MBUAPCD thresholds for these pollutants and therefore there would not be a significant contribution to an existing air quality violation.

Project construction may result in a short-term, localized decrease in air quality due to generation of dust during the excavation for the fence footings. However, the course sands that are prevalent in the project area are relatively large particles and do not contain a high ration of fine particulate.

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

Discussion: The project would not conflict with or obstruct implementation of the regional air quality plan. See K-1 above.

3.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

Discussion: See K-1 above. The project would not conflict with any applicable federal ambient air quality standards.

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

Discussion: The project would not generate substantial pollutant concentrations.

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

Discussion: The project would not generate any objectionable odors.

L. GREENHOUSE GAS EMISSIONS

Would the project:

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

Discussion: The proposed project, like all development, would be responsible for an incremental increase in green house gas emissions by usage of fossil fuels during the site grading and construction. Santa Cruz County has recently adopted a Climate

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

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 green house 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 L-1 above. No impacts are anticipated.

M. PUBLIC SERVICES

Would the project:

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Other public facilities; including the maintenance of roads?	☐	☐	☐	☒

Discussion (a through e): The project would accommodate existing Juvenile Hall clients and would not generate any increase in employees or visitors to the facility, and would thus have no impact on public services. Moreover, the project meets all of the standards and requirements identified by the local fire agency.

N. RECREATION

Would the project:

1. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

Discussion: Juvenile Hall is not available to be used by the public for recreational activities and thus would not impact existing parks or recreational facilities.

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 include the construction of any recreational facilities.

O. UTILITIES AND SERVICE SYSTEMS

Would the project:

1. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

Discussion: The proposed project will result in less storm water runoff with the installation of a storm water catchment system. This is a beneficial impact.

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?	☐	☐	☐	☒

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

Discussion: The project site (Juvenile Hall) is already connected to an existing municipal water supply and served by an existing on-site sewage disposal system, which is adequate to accommodate the light demands of the project. The project includes enhancing the septic system to meet current standards for septic in sandhills habitat. This is a beneficial impact.

3.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒

Discussion: The project's wastewater flows would not violate any wastewater treatment standards.

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

Discussion: The project would serve only the existing clients and staff of the County Juvenile Hall with no expansion of use, thus no new or expanded entitlements are needed.

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: There will be no new demand as a result of the project, which will serve the existing Juvenile Hall population.

6.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒

Discussion: There will be no new demand on landfill capacity as a result of the project, which will serve the existing Juvenile Hall population.

7.	Comply with federal, state, and local statutes and regulations related to	☐	☐	☐	☒

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

solid waste?

Discussion: There will be no new solid waste demand as a result of the project, and it will comply with all federal, state and local statutes and regulations.

P. LAND USE AND PLANNING

Would the project:

1.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

Discussion: With mitigations to address new ground disturbance in a Sandhills habitat area as discussed under Section C (Biologic Resources), the proposed project does not conflict with any regulations or policies adopted for the purpose of avoiding or mitigating an environmental effect. An Incidental Take Permit from the U.S. Fish and Wildlife Service (USFWS) will be required, and either on-site habitat restoration or the purchase of off-site conservation credits, or some combination thereof, will be the required mitigation in order to be in compliance with sensitive species protection regarding potential incidental take of the federally-protected Mount Hermon June Beetle.

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

Discussion: The Probation Department is in the process of obtaining a low impact HCP for the permitted recreational facility, and will be required to obtain a separate HCP for this project as well. Both HCPs are being written by the same biologist and the mitigations and conditions from the twp plans will be coordinated to ensure no conflict.

3.	Physically divide an established community?	☐	☐	☐	☒

Discussion: The project would not include any element that would physically divide an established community.

Q. POPULATION AND HOUSING

Would the project:

1.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example,	☐	☐	☐	☒

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

through extension of roads or other infrastructure)?

Discussion: The proposed project is designed at the density and intensity of development allowed by the General Plan and zoning designations for the parcel. The proposed new structure would serve the existing Juvenile Hall population and would not result in additional users or trips to the Juvenile facility. Additionally, the project does not involve extensions of utilities (e.g., water, sewer, or new road systems) into areas previously not served. Consequently, it is not expected to have a growth-inducing effect.

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

Discussion: The proposed project would not displace any existing housing since the site is currently developed with County Juvenile Hall facility and would have no impact on housing in the area.

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

Discussion: The proposed project would not displace people because the site is currently used as a County Juvenile Hall facility.

R. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

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 of this Initial Study. Resources that have been evaluated as significant would be potentially impacted by the project, particularly biotic resources. However, mitigation measures have been incorporated that clearly reduce these effects to a level below significance. Mitigation options include on-site habitat restoration or off-site Sandhills habitat land bank investment as required to obtain a US Fish and Wildlife Incidental Take Permit in order to mitigate the potential for incidental take of Mount Hermon June Beetles during ground disturbance in a Sandhills habitat area. Also included are measures to avoid and minimize potential impacts to the Santa Cruz Kangaroo rat. 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 Significance.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
2. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

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 is no substantial evidence that, after mitigation, there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
3. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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. 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. TECHNICAL REVIEW CHECKLIST

	REQUIRED	DATE COMPLETED
Agricultural Policy Advisory Commission (APAC) Review	Yes ☐ No ☐	
Archaeological Review	Yes ☐ No ☐	
Biotic Report/Assessment	Yes ☒ No ☐	August 7/12, 2015
Geologic Hazards Assessment (GHA)	Yes ☐ No ☐	
Geologic Report	Yes ☐ No ☐	
Geotechnical (Soils) Report	Yes ☐ No ☐	
Riparian Pre-Site	Yes ☐ No ☐	
Septic Lot Check	Yes ☐ No ☐	
Other:	Yes ☐ No ☐	

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

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.

VI. ATTACHMENTS

1. Biotic Report, prepared by Jodi McGraw Consulting, dated August 7, 2015
2. Biotic Report, prepared by David Laabs, dated August 12, 2015
3. Bulk Asbestos Analysis, prepared by Forensic Analytical Laboratories, dated May 4, 2014

Jodi McGraw Consulting
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August 7, 2015

Melissa Allen
Senior Departmental Administrative Analyst
Santa Cruz County Probation Department
P.O. Box 1812
Santa Cruz, CA 95061

RE: Biological Report for Juvenile Detention Center Site, 3650 Graham Hill Road Felton, CA (APN: 061-371-16). *Survey conducted under US Fish and Wildlife Service Recovery Permit TE 118641-2.*

Dear Ms. Allen:

I am writing to provide you with a report of my assessment and survey of the rare and endangered species and sensitive habitat within and near the County of Santa Cruz Probation Department's Juvenile Detention Center facility. The facility is located in the southern portion of the County's approximately 28-acre parcel (APN: 061-371-16) at 3650 Graham Hill Road in the unincorporated portion of Santa Cruz County between Felton and Scotts Valley, California. The parcel supports special-status plants and animals that occur within the Santa Cruz Sandhills—an ecosystem that occurs on Zayante sand soil within central Santa Cruz County (Table 1; McGraw 2008, 2011, Arnold and Blandel 2014).

At the request of the Probation Department, I completed in July 2015 a draft Habitat Conservation plan to cover impacts to the federally-endangered Mount Hermon June beetle that would result from the Probation Department's proposed development of a multipurpose facility in the fenced yard north of the detention center buildings.

Based on our conversations and correspondence, I understand that the Probation Department has since been offered state funding to improve the interior of the buildings as well as enhance outside infrastructure. Potential project elements include the following:

1. Renovating and upgrading the facility including to kitchen, dining area, seismic/structural bracing, mechanical and plumbing, security and fire safety;
2. Developing a 'seed to table garden' in the fenced yard;
3. Replacing the existing perimeter fence to enhance security;
4. Repaving the existing paved parking lot and removing trees that have uplifted the pavement through their root growth and eliminating parking 'islands' that once featured trees that have been removed or will be removed;
5. Making necessary upgrades to equipment in the generator utility area west of the building;
6. Enhancing the wastewater treatment system; and
7. Removing a large ponderosa pine stump near the entrance of the building; and

ATTACHMENT 1

8. Possibly installing a sally port to promote secure drop off in the police entrance located on the western portion of the building.

The improvements listed under item 1 above will occur in the interior of the facility and not affect open soil within the property.

The purpose of my assessment was to evaluate whether the other project components (2-8 above) would impact special-status species. In the approximate locations of the project component areas as well as along the access routes that would be used during construction (Table 2, Figure 1), I implemented the following:

1. An assessment of habitat including soils and vegetation;
2. A survey for the rare plants; and
3. A three-day, presence/absence survey for the Zayante band-winged grasshopper.

A survey for the Mount Hermon June beetle were not conducted, as the habitat assessment identified that all unpaved areas are likely to support the species (Table 2). Surveys for Santa Cruz kangaroo rat were recommended and I understand they were implemented concurrently by biologists from Biosearch, who will provide the Probation Department their findings and recommendations in a separate report.

The 4.3-acre area that was assessed and surveyed for this report includes most of the Juvenile Detention facility (Figure 1). Additional parking areas to the south were not assessed as no off-pavement work is anticipated in this area, nor is work anticipated to occur in Michael Gray Field—the park (ballfield) located east of the facility and west of the paved access road.

This report describes the assessment and survey methodology and then provides the results, which are summarized in Table 2. It also identifies associated permit requirements, and provides initial recommendations for how the County can avoid and minimize the impacts.

Existing Development and Land Use

The assessment and survey area features a range of facilities including buildings, paved parking lots, a fenced yard with a paved basketball court and a mowed area, ornamental trees and other plantings, and planter boxes. The roads east of the facility, which are anticipated to be used in construction, include: 1) a paved road that ascends Mount Hermon and terminates at the telecommunications facility at the northern end of the County's parcel, 2) an unpaved (natural surface) road north of the fenced perimeter which terminates at the San Lorenzo Valley Water District's (SLVWD's) Pasatiempo Well, and 3) a separate unpaved road that provides access to the east end of the fenced yard.

Soils

As mapped by the Soil Conservation Service, the subject parcel contains Zayante soils, which are poorly developed, deep, coarse, sand soils derived from the weathering of uplifted marine sediments and sandstones (USDA 1980). Some project areas feature areas of pavement (i.e. asphalt or concrete); they include the parking area, sally port area, and utility area (Table 2). Unpaved areas feature sand soil characteristic of the Zayante series. The soil varies in color from light grey to medium grey brown, reflecting variability in organic matter; darker soils occur in areas with dense tree cover (Table 2). Soil ranges from loose and friable, to relatively compact (Table 2).

Vegetation

Plant species composition and structure (i.e. vegetation) within the assessment and survey area varies greatly due primarily to the type and intensity of land use, but also natural variation in plant community structure within the intact habitat. The assessment area features areas of intact native sandhills vegetation, ornamental/landscape plantings, areas of ruderal (disturbance-adapted) vegetation, and paved areas which lack vegetation (Table 2).

Intact native vegetation includes two native sandhills plant communities: silverleaf manzanita chaparral, which is a type of northern maritime chaparral, and ponderosa pine forest, which is a type of maritime coast range ponderosa pine forest. Both communities are sensitive and protected under the County's Sensitive Habitat Ordinance.

Silverleaf manzanita chaparral occurs along the paved access road to the east, along the northern fence line, and in the northwest corner of the assessment area, south of SLVWD's well. Silverleaf manzanita chaparral is dominated by native shrubs including silverleaf manzanita (*Arcotstaphylos silvicola*), yerba santa (*Eriodictyon californicum*), Santa Cruz Mountains manzanita (*Arctostaphylos crustacea* ssp. *crinita*), and sticky monkeyflower (*Mimulus aurantiacus*) with bracken fern (*Pteridium aquilinum* var. *pubescens*) and herbs such as *Pseudognaphalium* sp. nov., Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*) and hooked pincushionplant (*Navarretia hamate*) occurring in the gaps between shrub canopies. In the sloped area on the northern portion of the fenced yard, the silverleaf manzanita chaparral has been invaded by exotic Portuguese broom (*Cytisus striatus*); elsewhere, this community is largely dominated by native species, due in part to prior invasive plant control projects on the property (McGraw 2006, Burks and McGraw 2012, McGraw 2013).

Ponderosa pine forest occurs along much of the northern and western perimeter of the site. It features ponderosa pine (*Pinus ponderosa*), coast live oak (*Quercus* agrifolia), and Pacific madrone (*Arbutus menziesii*) in the overstory, with shade-tolerant herbs and shrubs in the understory including poison oak (*Toxicodendron diversilobum*), California blackberry (*Rubus ursinus*), California coffee berry (*Frangula californica*), and bracken fern. The parking area and other more developed portions of the project area feature remnant, mature ponderosa pine and coast live oak with more ruderal vegetation consisting of plant species adapted to disturbance.

Portions of the project area feature ornamental plantings including manzanitas (e.g. *Arctostaphylos* cf. *hookeri*), mahonia (*Berberis* sp.), acacias (*Acacia* sp.), and iceplants (*Carpobrotus* spp.). Other areas which have not been planted but are mowed or cleared, such as the flat portion of the fenced yard including the proposed garden area, feature ruderal vegetation characterized by primarily exotic annual grasses and forbs including smooth cat's ears (*Hypochaeris glabra*), rattail fescue (*Festuca myuros*), horsetail (*Erigeron Canadensis*), and sheep sorrel (*Rumex acetosella*).

Special-Status Plants

The assessment area features occurrences of two special-status plant species: Ben Lomond spineflower and silverleaf manzanita. Ben Lomond spineflower was observed in the northwestern corner of the assessment area, just west of the SLVWD's well, and also along the paved access road east of the facility. Likewise, silverleaf manzanita occurs in the northwest portion of the assessment area, just south of the well, and along the paved access road. The rare shrub also occurs inside the northern portion of the perimeter fence.

I did not observe Ben Lomond wallflower and Ben Lomond buckwheat in the assessment area.

Special-Status Animals

Mount Hermon June Beetle

All of the unpaved portions of the proposed project areas likely support the Mount Hermon June beetle—an insect that feeds as a fossorial larva on plant roots and associated mycorrhizae, and then emerges as an adult in late spring and summer in order to mate. This species occurs in areas with Zayante soils that feature a variety of vegetation, including not only native Sandhills communities but also landscape and ornamental vegetation. Perhaps because it lives 99% of its life belowground, the Mount Hermon June beetle has been found within developed areas and other areas impacted by human uses, including mowed areas subject to recreation and denuded areas, such as vehicle turnouts along Graham Hill Road. The Mount Hermon June beetle is known to occupy the intact habitat within the subject parcel, where intact Sandhills habitat on the northern portion supports a relatively high abundance of the species (J. McGraw, unpublished data).

Habitat for the Mount Hermon June beetle within the project areas varies from intact to highly degraded (Table 2). The ponderosa pine forest and silverleaf manzanita chaparral are intact and feature relatively loose sand soil and diverse assemblages of native species. The entrance area and parking islands are highly degraded as they feature more compacted soil and limited native plant cover. Area of intermediate habitat quality include the garden area, utility area, and much of the fence alignment where native plant species occur patchily along with exotic plants including ice plant and Portuguese broom.

Zayante Band-Winged Grasshopper

Some project areas had limited potential to provide habitat for the Zayante band-winged grasshopper—an insect that requires open sunlit, sparsely vegetated areas in Zayante soils. Specifically, the garden area, utility area, and western fence alignment all feature these conditions. Mowing and related land-use activities likely degrade habitat, which is also small (<0.25 acre) and isolated from other suitable habitat by dense forest. The Zayante band-winged grasshopper is known to occur within the habitat set-asides surrounding the Hanson Quarry, approximately 800 feet northeast of the project site (USFWS 2009) and has been reported near the San Lorenzo Valley Water District's water tank in the northern portion of the parcel (Arnold and Blandel 2014).

Based on these factors indicating the site had some ability to support the Zayante band-winged grasshopper, I recommended that a presence/absence survey be used to evaluate whether the project area is occupied by the endangered insect. I received permission from Douglass Cooper, Deputy Assistant Field Supervisor with the U.S. Fish and Wildlife Service to conduct the presence/absence survey under my recovery permit for the Mount Hermon June beetle and Zayante band-winged grasshopper (TE 118641-2).

The survey area included all potentially suitable habitat within the 4.3 acre assessment area (Figure 1). I conducted the presence/absence survey on three days during the species' adult activity period this year (Table 3), which I determined through ongoing, weekly monitoring of the species since June 2015 at the Quail Hollow Quarry Conservation Areas, located two miles north-northwest of the project area. This 'control' population was examined each day of the survey to verify that the survey occurred on a day when the Zayante band-winged grasshopper was active, and thus more likely to be detected within the proposed project area if it is present.

Surveys occurred on days with weather conditions conducive to the species' activity; temperatures were between 84 °F and 92 °F and there was little wind (Table 3). The three surveys were conducted across a range of times of the day during which the species is active (i.e. 11:30 a.m. to 4 p.m.) to ensure that sunlight fell on each portion of the ground through the surrounding tree canopy in each area during at least one survey.

On each survey day, I walked parallel, contiguous, approximately 10-wide belt transects throughout the survey area in search of grasshoppers. Surveys of the project areas required one hour, as did the survey of the control (Table 3).

During the three-day survey, I did not observe any Zayante band-winged grasshoppers within the proposed project areas (Tables 3). During the three days, I observed a total of 31 of the endangered grasshoppers at the reference site during the approximately same period of time spent searching (Table 3).

Potential Project Impacts

Based on my survey results and observations of the habitat conditions within the proposed project area, and known information about the distribution and ecology of the special-status species, the proposed new improvements to the Juvenile Detention Center will likely impact the Mount Hermon June beetle. Individuals that occur underground can be killed during soil excavation for the fence and wastewater treatment system upgrade. The project will also impact the species by permanently covering habitat within the portion of open soil within the project disturbance envelopes, such as through installation of the garden facilities (greenhouses and raised beds), fence footings and piers, and additional pavement, if any, in the parking area. Approximately 10-15% of the proposed project area features asphalt (parking area and eastern access road) or concrete (utility area) which already precludes use of habitat below by the Mount Hermon June beetle. Much of the unpaved areas including the dirt portion of the access route contain habitat that has been degraded by soil compaction and vegetation modifications associated with use of the property. Portions of the project area include relatively intact habitat characterized by loose sand soil and native plant cover.

Removal of trees associated with the wastewater treatment upgrades and parking area enhancement would further impact the species by reducing roots upon which it feeds. The project improvements also have the potential to indirectly impact Mount Hermon June beetle, by promoting the invasion and spread of exotic plants that can be facilitated by disturbance. The nocturnal beetles can also be impacted if the project improvements increase the size, number, or frequency of use of outdoor night lighting, which attracts male beetles and disrupts breeding. These impacts could be reduced by utilizing night lights that emit wavelengths that do not attract nocturnal insects.

The project components may also impact silverleaf manzanita, individuals of which may be killed as a result of work to replace the fence. Such impacts could potentially be avoided if the plants are flagged for avoidance by crews when installing the fence. Silverleaf manzanita could also be impacted as a result of construction along the access road, though such impacts could similarly be avoided by installing fences to prevent off-road vehicle use.

Construction fences would similarly likely be sufficient to avoid impacts to Ben Lomond spineflower along the access road. Fences or symbolic fencing could also be used to alert crews to the population west of the SLVWD's well, should foot travel need to occur in that area as part of work to install the fence.

The other rare and endangered plants and animals of the Sandhills do not occur within or adjacent to the project footprint; therefore, the project is not anticipated to impact the Zayante band-winged grasshopper, Ben Lomond wallflower, or Ben Lomond buckwheat.

Project Permitting Requirements and Processes

The federal Endangered Species Act makes it illegal to 'take' (kill, harm, harass, etc.) endangered animals including the Mount Hermon June beetle (MHJB). However, the U.S. Fish and Wildlife Service (USFWS), which administers the Act, can permit take of the endangered insect that might occur incidentally during the course of otherwise lawful projects, such as facility improvements, by issuing what is known as an 'incidental take permit' (ITP).

In order to receive an ITP under Section 10 of the Endangered Species Act, project proponents must complete a Habitat Conservation Plan (HCP), which outlines how they will mitigate the project's negative effects on the endangered species. Mitigation must include steps to avoid, minimize, and repair impacts at the project site, as well as efforts to compensate for them by benefiting similar habitat elsewhere. Given the modest size of the proposed project and low anticipated impacts to the MHJB as well as other environmental resources, it could potentially receive an ITP through preparation of a low-effect HCP, which can be more rapidly reviewed and permitted by the USFWS relative to a regular HCP.

At the Probation Department's request, the proposed project improvements could be incorporated into the existing, administrative draft HCP for the multipurpose room proposed for construction in the fenced yard. This would delay submittal of the existing HCP, as additional information about the new, proposed facility improvements would need to be developed in order to describe them and characterize their impacts in the HCP. Having a single HCP could reduce some costs including administration relative to having two separate HCPs and resulting federal permits for the same site.

I note that, if the proposed project were to involve an act of the federal government, such as provision of federal funding or permits, then the project would be subject to an intra-agency consultation between the USFWS and the other federal agency involved in the project. Rather than preparing an HCP, the County would consult with the USFWS, which would then issue a biological opinion that describes project avoidance, minimization, and mitigation measures designed to reduce impacts. An act of the federal government that would create the nexus that would trigger such a Section 7 consultation can include funding for the project (e.g. grants) and federal agency regulatory oversight or jurisdiction. I understand from our communications that this project does not have federal funding or a federal nexus, and that a Section 10 permit will need to be sought by preparing an HCP.

Finally, the County's Sensitive Habitat Ordinance also regulates activities that occur within Sandhills habitat supporting rare species. Steps taken to avoid, minimize, and mitigate project impacts as part of compliance with the federal Endangered Species Act often satisfy the County's own requirements, though this is not always the case, making it important to coordinate project permitting with the County to ensure compliance with the ordinance.

Next Steps

This initial information is provided to assist evaluation of the proposed project. Should you decide to pursue the project, I recommend that you contact the U.S. Fish and Wildlife Service, which administers the Endangered Species Act, and the County of Santa Cruz Planning Department, which implements the County's Sensitive Habitat Ordinance. Precise aspects of the project and its conservation strategy should be developed as part of a more detailed planning process conducted in coordination with representatives of these agencies (Table 4).

I would be happy to assist the County further with project permitting for this project, by either revising the existing draft HCP for the property, or preparing a new HCP for this project.

Please do not hesitate to contact me if you have any questions regarding the habitat assessment or if I can assist you further.

Sincerely,

Jodi M. McGraw

ATTACHMENT 1

References

Arnold, R. A. and J. Bandel. 2014. Low-effect habitat conservation plan for the endangered Mount Hermon June beetle, the endangered Zayante band-winged grasshopper, and the threatened California red-legged frog for the Scotts Valley Multi-Agency Regional Intertie Project in Santa Cruz County, CA. Prepared for the San Lorenzo Valley Water District. February 2014. 63 pages.

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McGraw, J. M. 2008. Habitat Assessment for 3650 Graham Hill Road (APN: 061-371-16), Felton, CA. Letter report provided to Jeffrey Bidmon, Santa Cruz County Probation Department. October 7, 2008.

McGraw, J. M. 2011. Biological Report for Juvenile Detention Center Site, 3650 Graham Hill Road Felton, CA (APN: 061-371-16). Report prepared by Jodi M. McGraw. Submitted to the County of Santa Cruz Probation Department. September 30, 2011.

McGraw, J. M. 2012. 2012 Annual Report for the Metro PCS Cingular/Willow Pond Project Habitat Mitigation Plan. Report submitted to AT&T Mobility and the County of Santa Cruz Planning Department. December 12, 2012. 18 pages.

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Tables and Figures

Table 1: Occurrence of special-status species of the Santa Cruz Sandhills within the County of Santa Cruz Parcel and Proposed Improvement Areas.

		Occurrence Within	
Common Name	**Status**	**Project Area**	**Project Parcel**
Santa Cruz kangaroo rat (*Dipodomys venustus venustus*)	California Species of Special Concern	Present Along Eastern Access Road	Present
Mount Hermon June beetle (*Polyphylla barbata*)	Federally Endangered	Present	Present
Zayante band-winged grasshopper (*Trimerotropis infantilis*)	Federally Endangered	Absent	Present
Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*)	Federally Endangered; List 1B.1[1]	Absent	Present
Santa Cruz wallflower (*Erysimum teretifolium*)	Federally Endangered; California Endangered; List 1B.1	Absent	Absent
silverleaf manzanita (*Arctostaphylos silvicola*)	List 1B.3	Present	Present
Ben Lomond buckwheat (*Eriogonum nudum* var. *decurrens*)	List 1B.1	Absent	Present

[1] Most rare, threatened, or endangered plants in California and elsewhere (CNPS 2015)

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Table 2: Habitat assessment of the project areas (Figure 1).

Project Component	Description	Soil Conditions	Vegetation Type and Dominant Species	Rare Species Occurrences and Habitat
Garden Area	Install raised beds, small greenhouses, a utility shed, and other improvements.	Partially paved (~50%) with concrete; light grey, medium grain sand soil of the Zayante series elsewhere.	**Ruderal:** Primarily non-native species adapted to disturbance including smooth cat's ears, horsetail, and sheep sorrel. Ornamental shrubs and a California coffee berry occur adjacent to the building.	Degraded habitat for the Mount Hermon June beetle.
Enhanced Wastewater Treatment System	Remove 1-2 ponderosa pine trees and install enhanced wastewater system (~40' x 25') where existing concrete tanks occur; install new tanks in adjacent paved parking lot.	Medium grey loose fine sand soil of the Zayante series, which is covered with dense litter (except where gopher mounds). Concrete tanks are approximately 2-4 feet deep.	**Ponderosa Pine/Ornamental:** Overstory of ponderosa pine and ornamental trees (e.g. *Acacia* sp.) with very sparse cover understory including poison oak. Ornamental juniper shrubs nearby.	Highly degraded habitat for the Mount Hermon June beetle.
Detention Fence	Replace existing fence with 16.5' tall no-climb fence with 'Candy Cane' top and 5' deep posts and continuous footings. Also relocate existing light standards (approx. 5-7) inside of the fenced yard and remove segment of fence connecting perimeter fence to building. Fence installation will likely require pruning or removing mature trees (coast live oak and ponderosa pine) as well as other vegetation.	Variable along perimeter, but generally light to medium grey sand of the Zayante series, that is darker and also more compacted near buildings on the southeast.	**Variable:** The fence traverses a range of vegetation along its length. The western and northern fence features silverleaf manzanita chaparral and ponderosa pine forest including: silverleaf manzanita, yerba santa, sticky monkeyflower, wedgelead horkelia (*Horkelia cuneata* ssp. *cuneata*) and bracken fern. Inside the yard, habitat on the northern boundary is infested by invasive Portuguese broom which has been controlled on the exterior. The eastern portion of the fence features native ponderosa pine with poison oak and bracken fern outside the yard, and ornamental species including ice plant inside the yard.	Mount Hermon June beetle habitat, which ranges from largely intact to degraded. Silverleaf manzanita present in northwestern portion of fence alignment. Ben Lomond spineflower was observed nearby the pump station adjacent approximately 75' feet northwest of the northwestern fence corner, but not observed in the area and therefore not anticipated to be impacted.

ATTACHMENT 1

Table 2: Habitat assessment of the project areas (Figure 1).

Project Component	Description	Soil Conditions	Vegetation Type and Dominant Species	Rare Species Occurrences and Habitat
Parking Lot and Entrance	Remove parking island and ponderosa pine as well as perhaps coast live oak trees adjacent to the lot that are causing asphalt to buckle with root growth. Remove previously cut ponderosa pine stump near flag pole to beautify entry	Parking islands and entrance area feature light to medium grey to tan sand soil of the Zayante series, which is compacted in places. Parking area features asphalt.	**Ruderal/Ornamental:** Parking island is largely denuded and features sparse non-native annual grasses and forbs including smooth cat's ears and rattail fescue. The entrance area features a native coffee berry and planted ornamental manzanita (*Arctostaphylos cf. hookeri*) and English ivy (*Hedera helix*). Trees in and around parking area including ponderosa pine and coast live oak.	Highly degraded Mount Hermon June beetle habitat.
Utility Area	Make necessary upgrades to utilities within the fenced enclosure which currently features a generator, fire suppression equipment, and other equipment.	Existing equipment is on concrete pads, surrounded by light grey, moderately loose sand soil of the Zayante series.	**Disturbed Sandhills:** Native species that occur in a range of sandhills communities surround the existing infrastructure, and include sticky monkeyflower, sand aster (*Corethrogyne filaginifolia*), golden aster (*Heterotheca sessiliflora* ssp. *echioides*), and silverleaf manzanita. Non-native species include Portuguese broom, sheep sorrel, and English plantain (*Plantago lanceolata*)	Degraded Mount Hermon June beetle habitat.
Sally Port	Install a fence at the entrance to the employee parking area/police entrance area southwest of the southwestern corner of the building, and/or install a fence along the western edge of the parking area.	Parking area is paved. Adjacent habitat features medium grey sand soil of the Zayante series.	Ponderosa Pine Forest: The area west of the parking lot features intact vegetation dominated by ponderosa pine, coast live oak, Pacific madrone, bracken fern, California blackberry (*Rubus ursinus*), and poison oak. Closer to the police entrance, the area features mostly pavement with a large coast live oak and landscaping beds including mahonia, ornamental manzanita, and coast live oak.	Relatively Intact Mount Hermon June beetle habitat west of the parking area; highly degraded Mount Hermon June beetle habitat within the landscaping beds.

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Table 3: Number of Zayante band-winged grasshoppers (ZBWG) observed during three survey days within the County's proposed project areas (Figure 1) and the South Ridge Conservation Area of the Quail Hollow Quarry in Ben Lomond, CA. Survey details provided in text.

	County Project Area				South Ridge Conservation Area			
Survey Day	Time	Temp (°F)	Wind (mph)	ZBWG (n)	Time	Temp (ºF)	Wind (mph)	ZBWG (n)
July 22, 2015	1400-1530	86	0-2	0	1530-1630	85	1-3	15
July 30, 2015	1530-1700	92	0-2	0	1230-1330	88	0-2	17
August 5, 2015	1200-1300	84	0-3	0	1400-1515	89	0-2	19
Total				**0**				**31**

Table 4: Representatives of the federal and local agencies that can assist with project permitting

U.S. Fish and Wildlife Service	County of Santa Cruz
Douglas Cooper	Matt Johnston
Deputy Assistant Field Supervisor	Environmental Coordinator
US Fish and Wildlife Service	County of Santa Cruz
2493 Portola Road, Suite B	701 Ocean Street
Ventura, CA 93003	Santa Cruz, CA 95060
(805) 644-1766 x272	(831) 454-3114
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ATTACHMENT 1

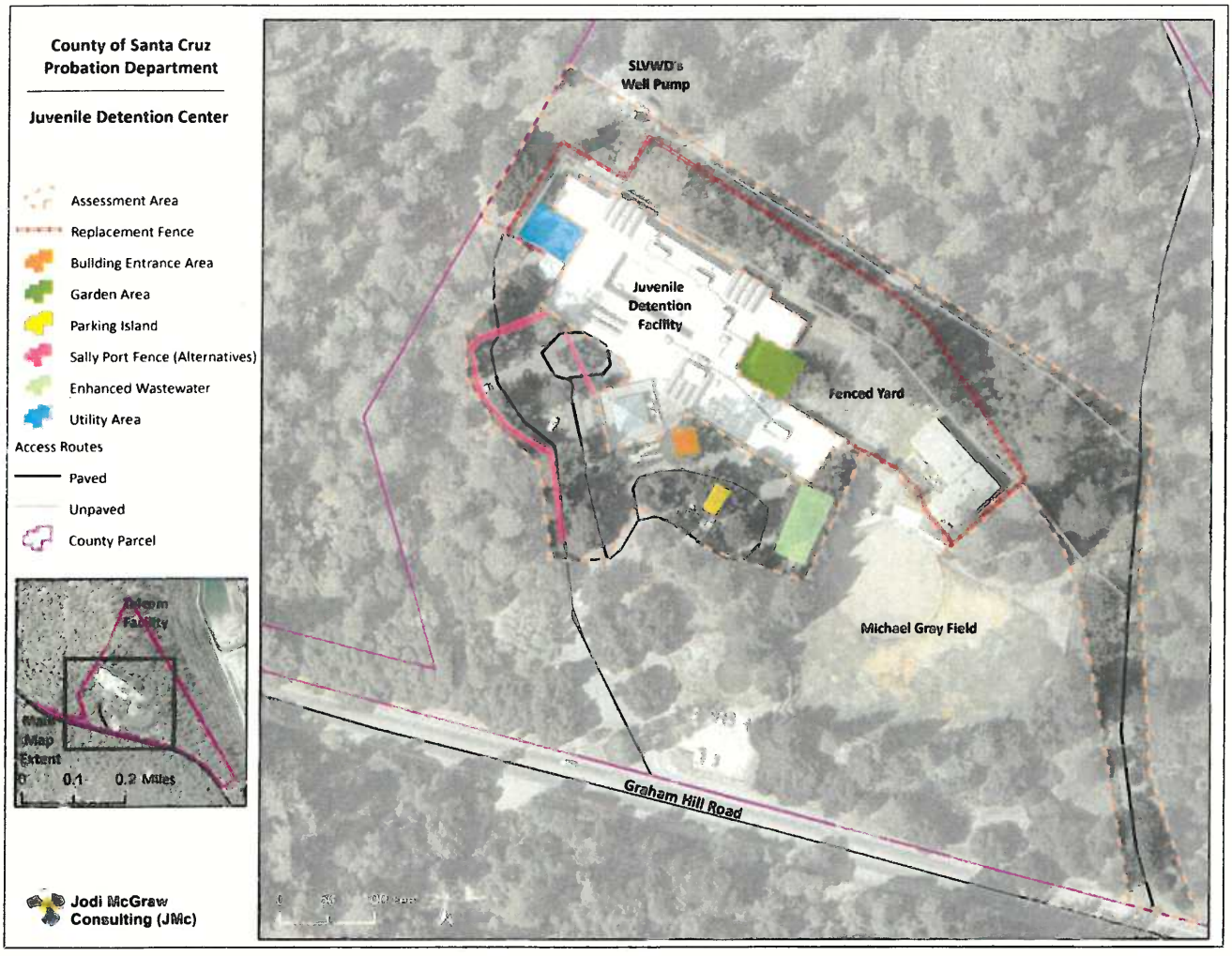

Figure 1: County of Santa Cruz Juvenile Detention Facility Assessment Area and Project Areas

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- Environmental Consulting
- Endangered Species Surveys

12 August 2015

Melissa Allen
County of Santa Cruz Probation Department
P.O. Box 1812
Santa Cruz, CA 95061

Subject: Santa Cruz Kangaroo Rat Habitat Assessment and Surveys for Probation Department Juvenile Hall Renovation and Upgrades Project.

Dear Ms. Allen,

At your request, I have prepared a habitat assessment for the Santa Cruz kangaroo rat (SCKR; *Dipodomys venustus venustus*) for the County of Santa Cruz Probation Department's Juvenile Hall, which is submitting a grant to renovate and upgrade the facility. For a previous project at the facility, the California Department of Fish and Wildlife (CDFW) requested that the County consider impacts to the SCKR that could occur as the result of the project. The subspecies is afforded special status based on its inclusion on the list of Special Animals maintained by CDFW (CDFG 2015). The County is preparing a Habitat Conservation Plan to address potential impacts to the federally-endangered Mount Hermon June Beetle (*Polyphylla barbata*), which is known from the vicinity.

Project Description. The project site is located at the Juvenile Hall at 3650 Graham Hill Road between Felton and Scotts Valley in unincorporated Santa Cruz County, California (Figures 1 and 2). The County proposes to implement a major renovation and upgrade of the facility, including improvements to the kitchen and dining area, seismic upgrades, building renovations including electrical, fire safety and security electronics, replacement of security windows and doors, installation of a seed-to-table garden, upgrades to the septic facilities, repaving of parking lots, and replacement of the exterior security fence.

Most of the project involves work within the existing project facility footprint, and do not involve disturbance of native habitats. The improvements to the kitchen and dining area, seismic upgrades, building renovations including electrical, fire safety and security electronics, replacement of security windows and doors are activities that are not expected to impact SCKR.

Several other improvements and upgrade elements are outside the buildings and are assessed in greater detail (see below). This includes security fencing replacement,

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improvements and upgrades to the generators, installation of a seed-to-table garden, upgrades to the septic system and repaving of a portion of the parking lot. Construction access to some of the fence replacement project the site will follow an existing graveled road from Graham Hill Road.

Methods. I visited the site on 31 July 2015 to assess habitat conditions on the site and in the surrounding area. All outdoor work areas and access routes were visited. Wildlife habitats at the site and in the vicinity were characterized. The results of prior biological field studies and assessments in the project vicinity were reviewed. The California Natural Diversity Data Base (CNDDB) was searched. Biologists with experience in the area were contacted regarding additional localities from the general project area. SCKR records from the area were compiled and mapped in relation to the project site.

Live-trapping in the project area was conducted between 4 August and 7 August 2015 to determine the presence of the species. The site was sampled with 25 Sherman® XLK live-traps traps for three nights for a total of 75 trap-nights. Traps were placed along the portion of the fence alignment bordering sandhills habitats at 10-meter intervals. Traps were set and baited within an hour of sunset and checked and closed within an hour of sunrise.

Santa Cruz Kangaroo Rat. The SCKR is restricted to a very small range in the foothills of the Santa Cruz Mountains in Santa Cruz County, California (Best 1992; Bolster 1998). The subspecies generally occurs in association with northern maritime chaparral habitats on inland marine sand deposits of the Zayante soil series (Roest 1988). Although the subspecies is not designated as a Species of Special Concern, CDFW includes it in its Special Animals List, and ranks the subspecies as being critically imperiled due to very low numbers of populations (CDFW 2015).

Zayante soils are well-drained, deep sand soils derived from weathering of uplifted marine sediments and sandstones (USDA 1980). These soils provide an ideal substrate for digging burrows, which is a critical habitat component for *D. v. venustus* (Hawbecker 1940). Typical woody plant species in areas where *D. v. venustus* has been documented include silverleaf manzanita (*Arctostaphylos silvicola*, brittleleaf manzanita (*A. tomentosa*), chamise (*Adenostoma fasciculatum*), coyote bush (*Baccharis pilularis*), wild lilac (*Ceonothus cuneatus*), poison oak (*Toxicodendron diversiloba*), monkey flower (*Mimulus aurantiacus*), yerba santa (*Eriodictyon californicum*), ponderosa pine (*Pinus ponderosa*) and knobcone pine (*Pinus attenuata*).

The range of *D. v. venustus* has been severely reduced by land use changes and habitat fragmentation. Based on the natural patchiness of suitable habitats, *D. v. venustus* populations historically likely functioned as a metapopulation, with patches of occupied habitat interconnected through occasional long-distance dispersal. Prior to large-scale habitat alteration in the area, patches of habitat could be re-colonized in the event of local extirpation. However, patch size reduction and alteration of dispersal connections have increased the likelihood of extirpation in localized patches and largely eliminated the possibility of re-colonization from distant patches.

Severe population declines of the SCKR have been reported (Bolster 1998; Bean 2003). By the 1980s, there were only a handful of sites supporting extant populations, including the Bonny Doon Ecological Reserve, the Olympia Watershed, Wilder Ranch, and Quail Hollow Quarry (Roest 1988; Axtell 1990). However, subsequent attempts to document presence of the species at these locales have been unsuccessful. The only site at which SCKR is known to persist is the Mount Hermon sandhills area, an area which covers ~350 acres and includes portions of Henry Cowell Redwoods State Park, Hanson Aggregates Felton Quarry, Mount Hermon Association, and lands operated by San Lorenzo Valley Water District and the Santa Cruz County Probation Department (Beasn, 2003; McGraw 2004).

The SCKR has been confirmed in several locales in the vicinity of the Juvenile Hall facility over the past five years (Figure 3). The species was confirmed by trapping along the San Lorenzo Water District access road approximately 300 feet southeast of the facility in May 2013 during a habitat assessment for a recreation facility (Biosearch 2013). The species has been detected by sign (tracks and burrows) and /or live-trapping at several locations between ~250 feet and 1,500 feet north of the facility between 2010 and 2015 (pers. obs.). SCKR have been detected at Henry Cowell Redwoods State Park to the south of Graham Hill Road regularly over the past 30 years (Roest 1984; Biosearch 1996; pers. obs).

Site Assessment. Most of the elements of the proposed project do not provide suitable habitat conditions for the SCKR. The improvements to the kitchen and dining area, seismic upgrades, building renovations including electrical, fire safety and security electronics, replacement of security windows and doors will take place within the project buildings and are not expected to impact SCKR.

The generators are housed in an outdoor area on the northwest part of the facility, bordered on three sides by buildings (Figure 4). This area contains Zayante soils, although the area is compacted and disturbed. Given the presence of suitable SCKR habitat ~50 feet from the project area, the species could occasionally occur in the project area at night.

The project footprint for the seed to table garden is in a small area surrounded on three sides by the facility (Figure 5). The area supports Zayante series sandy soils. The area is dominated by non-native annual grasses and forbs and no shrubs are present. Given the high level of regular disturbance in the area, this part of the project is not expected to impact SCKR.

Improvements to the septic system will include placement of new tanks beneath a portion of the existing parking lot, and upgrades to the septic field, which is situated adjacent to the baseball field in an area planted with ornamental trees and shrubs (Figure 6). The area does not support sandhills vegetation, and this part of the project is not expected to impact SCKR.

A portion of the parking lot will be repaved. While a few trees, which are causing buckling to the parking lot, will be removed, this part of the project is not expected to impact SCKR (Figure 7).

The perimeter fence to be replaced measures ~1,100 feet in length. Approximately 380 feet of this fence is in the interior of the facility, and is highly disturbed (Figure 8). This area does not support native vegetation and the project is not expected to impact SCKR.

The fence along the northern edge of the site borders chaparral habitat on Zayante soils, which provides habitat for SCKR. Approximately 720 feet of the fence alignment is situated at the edge of suitable SCKR habitat. On the interior of the fence, the engineered slope is mulched, and is occasionally cleared of vegetation for security reasons. However, the slope supports shrub species typical of the neighboring sandhills habitats along with non-native broom. On the exterior side of the fence, sandhills habitats are present either directly adjacent to the fence or separated from the fence by a dirt road (Figures 9 and 10).

The access route between Graham Hill Road and the fenced facility passes through an area that supports sandhills habitats that are suitable for the SCKR (Figure 11). The access road itself is graveled, so does not provide conditions suitable for burrowing, but the area immediately on either side of the road is potential habitat for the species. Presence of the SCKR along the access route was confirmed by live-trapping in 2013 (Biosearch 2013).

Live-Trapping. Live-trapping was conducted along the perimeter fence alignment that borders sandhills habitats, a distance of ~720 feet. An adult male SCKR was captured on 5 August 2015 near the northwestern corner of the fence (Figure 12). The slope below the fence in this area supports a relatively dense shrub cover, including silverleaf manzanita. Intact sandhills habitats are present to the north and west. A probable kangaroo rat burrow was observed approximately two feet from the fence inside the facility, and the individual went further into the scrub downslope when released. Two other species of native small mammals were captured - pinyon mouse (*Peromyscus truei*) and western harvest mouse (*Reithrodontomys megalotis*).

Discussion and Recommendations. Based on a site assessment and trapping results, the only project element with the potential to directly impact SCKR is the fence replacement. The other proposed actions will take place on the interior of the buildings, or in outdoor areas that are highly disturbed and/or do not support sandhills habitats.

The fence replacement project will involve digging a trench along the alignment, at least 5' deep and 18" wide, which will be used to form a concrete foundation. The fence, which will be anchored into the foundation, will be 16 ½ feet tall. The fencing material will be a tighter weave than is present currently for security reasons, and will extend to ground level. Digging the trench could crush burrows or kill or injure SCKR in their burrows, if present. SCKR could become trapped in the trench if it remains open at night. In the long term, the presence of the concrete foundation represents a loss of

burrowing habitat. Also, given that the species is currently utilizing at least some of the interior of the facility in the northwest corner of the site, replacement of a fence with tighter mesh would prevent SCKR from passing through the fence and represents a loss of a small amount of burrowing and foraging habitat.

SCKR habitat is also present along the access route for the fence replacement project. The road is used regularly by San Lorenzo Valley Water District personnel, and the additional traffic resulting from the project is considered negligible. However, measures should be taken to ensure that project vehicles do not disturb adjacent sandhills habitats.

The following measures should be implemented to reduce impacts to SCKR.

- Restrict construction to daylight hours (½ hour after sunrise to ½ hour prior to sunset) to avoid SCKR, which are not active above ground during this time.

- Restrict vehicle traffic to the greatest degree possible. Use temporary fencing and signage during the period of construction to prevent vehicles from entering sandhills habitats.

- Prior to ground disturbance for the fence replacement project, a burrow search and live-trapping should be conducted in potential SCKR habitat. Depending on whether burrows are present within or near the project footprint, potential mitigations could include avoidance, housing captured SCKR in captivity until the project is completed in a given area, and release of SCKR into artificial burrows.

- If trenches are to be left unfilled overnight, they should either be completely covered with plywood sheets or provided with escape ramps every 100 feet.

- Trenches should be checked prior to work each morning by a biological monitor to ensure that no kangaroo rats have been trapped. Any trapped kangaroo rats should be removed from the trench.

Please let me know if you have any questions or require additional information.

Best regards,

David Laabs
Wildlife Biologist

Citations

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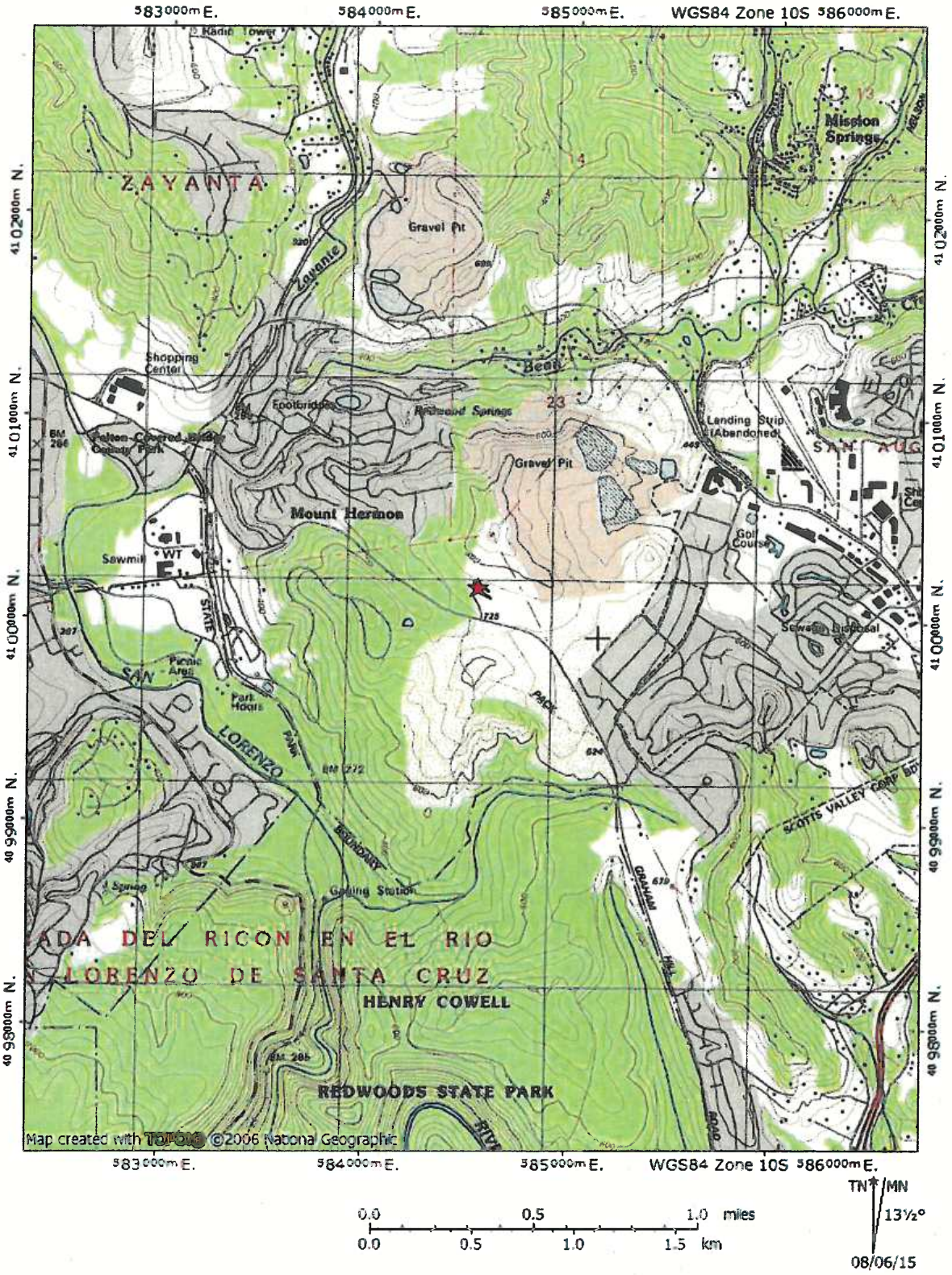

Figure 1. Location of Santa Cruz Juvenile Hall.

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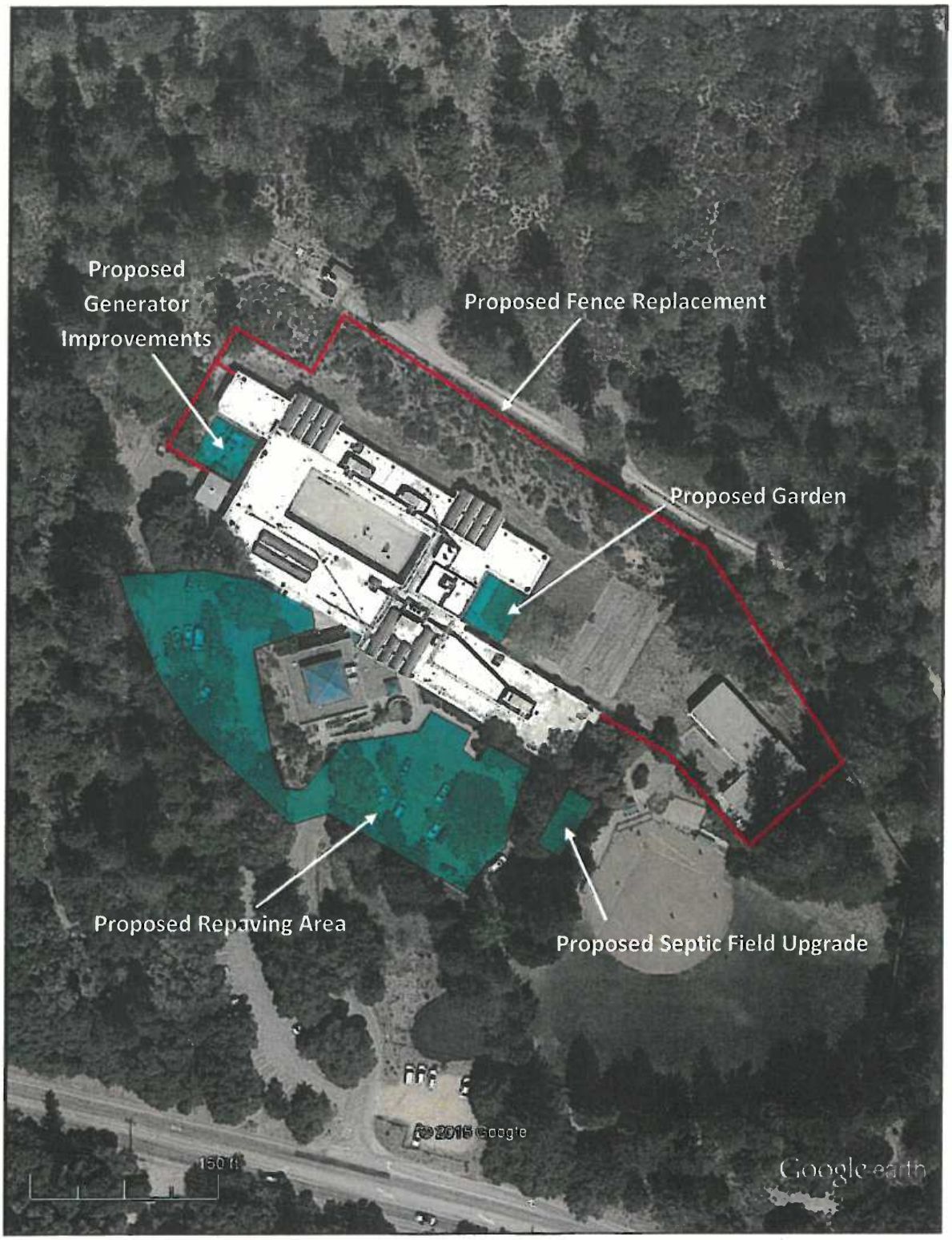

Figure 2. Aerial image of Juvenile Hall Renovations and Upgrades project site. Only exterior improvements shown.

Figure 3. Santa Cruz kangaroo rat detections (white circles) in vicinity of Graham Hill Juvenile Hall, 2010-2015.

ATTACHMENT 2

Figure 4. Proposed generator upgrade area.

Figure 5. Proposed seed-to-table garden area.

ATTACHMENT 2

Figure 6. Proposed septic field upgrade area.

Figure 7. Proposed parking lot repaving area.

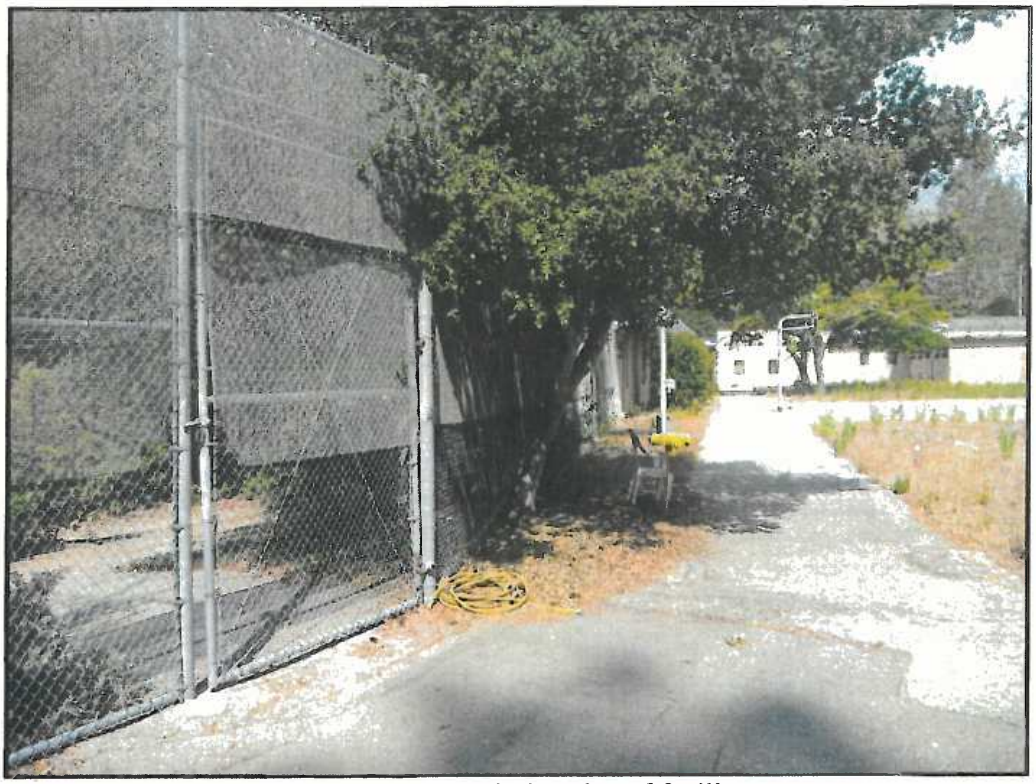

Figure 8. Proposed fence replacement in interior of facility.

Figure 9. Proposed fence replacement along north side of facility.

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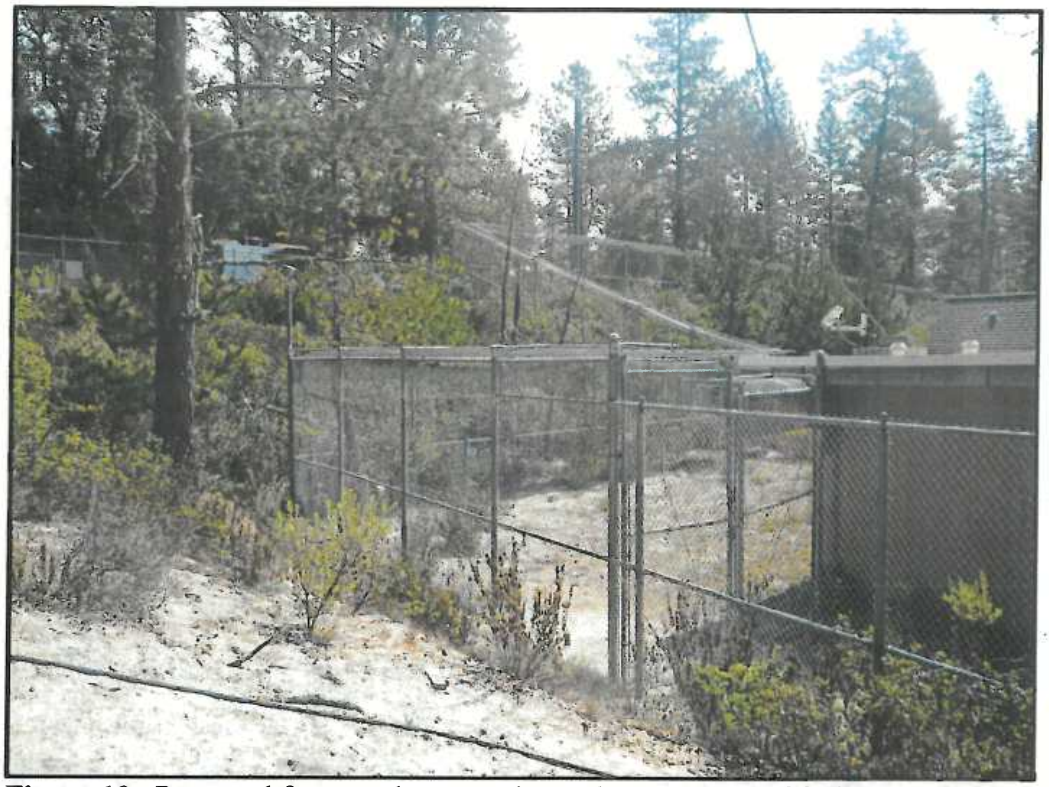

Figure 10. Proposed fence replacement in northwest corner of facility.

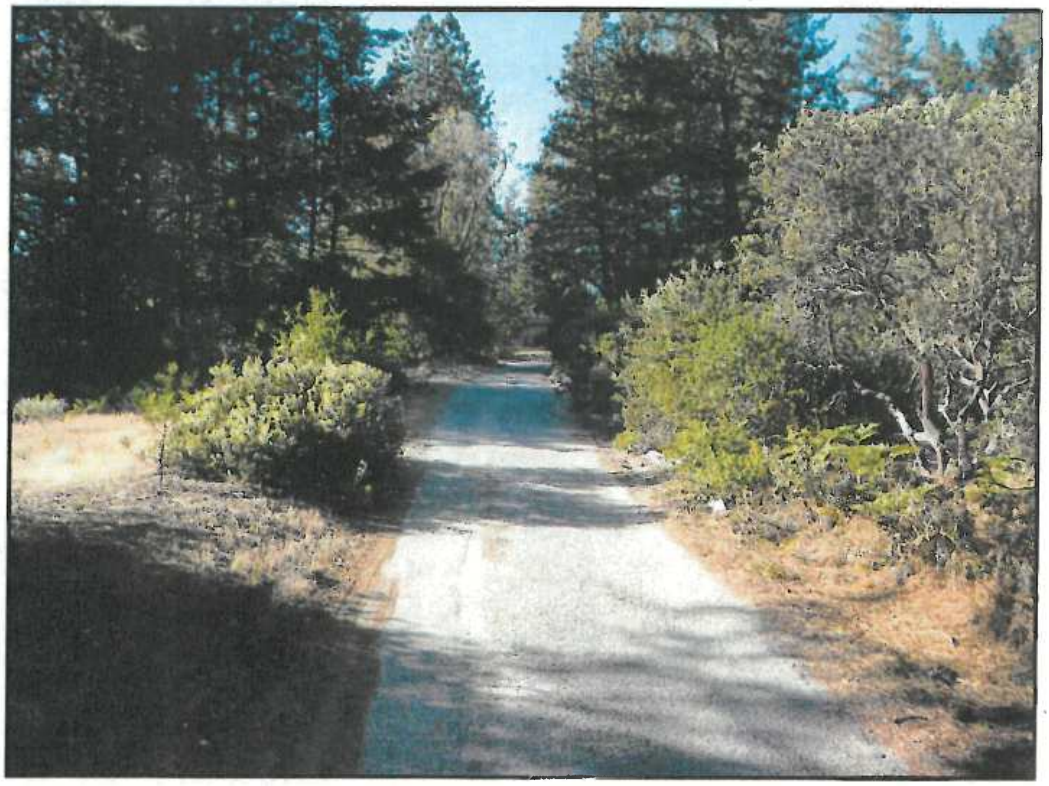

Figure 11. Proposed fence replacement access road.

Figure 12. Santa Cruz kangaroo rat trapped at Graham Hill Juvenile Hall, 08/05/15. Portion of the fence alignment in potential SCKR habitat shown in green.

Forensic Analytical Laboratories

Final Report

Bulk Asbestos Analysis

(EPA Method 600/R-93-116, Visual Area Estimation)

Co. of Santa Cruz General Svcs.
Joshua Reilly
701 Ocean Street
Rm. 330
Santa Cruz, CA 95060

Client ID: L1651
Report Number: B205112
Date Received: 05/05/15
Date Analyzed: 05/05/15
Date Printed: 05/06/15
First Reported: 05/06/15

Job ID/Site: Probation, 3650 Graham Hill Rd., Felton

Date(s) Collected: 05/04/2015

FALI Job ID: L1651
Total Samples Submitted: 4
Total Samples Analyzed: 4

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
jh1050115	11639200						
Layer: Brown Mastic			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (Trace)							
jh2050115	11639201						
Layer: Tan Fibrous Material			**ND**				
Layer: Paint			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (95 %)							
prob1050115	11639202						
Layer: Brown Mastic			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (Trace)							
prob2050115	11639203						
Layer: Tan Fibrous Material			**ND**				
Layer: Paint			**ND**				
Total Composite Values of Fibrous Components:		**Asbestos (ND)**					
Cellulose (95 %)							

Tad Thrower

Tad Thrower, Laboratory Supervisor, Hayward Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

ATTACHMENT 3

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