County of Santa Cruz

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CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
INITIAL STUDY/ENVIRONMENTAL CHECKLIST

Date: August 13, 2021 **Application Number:** 161014

Project Name: Ranport Lumbermill **Staff Planner:** Annette Olson

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: Brian Spector of Spector Corbett Architects **APN(s):** 052-511-06, -08 and 052-011-61

OWNER: Richard M. Henry **SUPERVISORIAL DISTRICT:** 2

PROJECT LOCATION: The proposed project is located on the north side of Ranport Road within the community of Watsonville in the unincorporated Santa Cruz County. Santa Cruz County is bounded on the north by San Mateo County, on the south by Monterey and San Benito counties, on the east by Santa Clara County, and on the south and west by the Monterey Bay and the Pacific Ocean.

SUMMARY PROJECT DESCRIPTION:

Proposal to establish a specialty lumbermill in five phases. In the first phase, the site infrastructure along with a bathroom would be constructed. The second phase would allow for the construction of a 5,000 square foot storage building, followed in the third phase by another 5,000 square foot storage building. The fourth phase would be the construction of the mill building. The final phase would be the replacement of the bathroom building with a two-story 1,600 square foot office building.

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.*

- ☒ Aesthetics and Visual Resources
- ☒ Agriculture and Forestry Resources
- ☐ Air Quality
- ☒ Biological Resources
- ☐ Cultural Resources
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation

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.*

- ☐ Energy
- ☐ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☒ Hazards and Hazardous Materials
- ☐ Hydrology/Water Supply/Water Quality
- ☐ Land Use and Planning
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities and Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance

DISCRETIONARY APPROVAL(S) BEING CONSIDERED:

- ☐ General Plan Amendment
- ☐ Land Division
- ☐ Rezoning
- ☒ Development Permit
- ☐ Sewer Connection Permit
- ☒ Coastal Development Permit
- ☒ Grading Permit
- ☐ Riparian Exception
- ☐ LAFCO Annexation
- ☒ Other: Agricultural Buffer Reduction

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

Permit Type/Action	Agency
SWPPP	RWQCB
1600	CFWD
Waste Discharge Requirement General Order No. WQ 2014-0153	RWQCB

CONSULTATION WITH NATIVE AMERICAN TRIBES: *Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?*

No California Native American tribes traditionally and culturally affiliated with the area of Santa Cruz County have requested consultation pursuant to Public Resources Code section 21080.3.1.

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

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

Matthew Johnston

MATT JOHNSTON, Environmental Coordinator

August 17, 2021

Date

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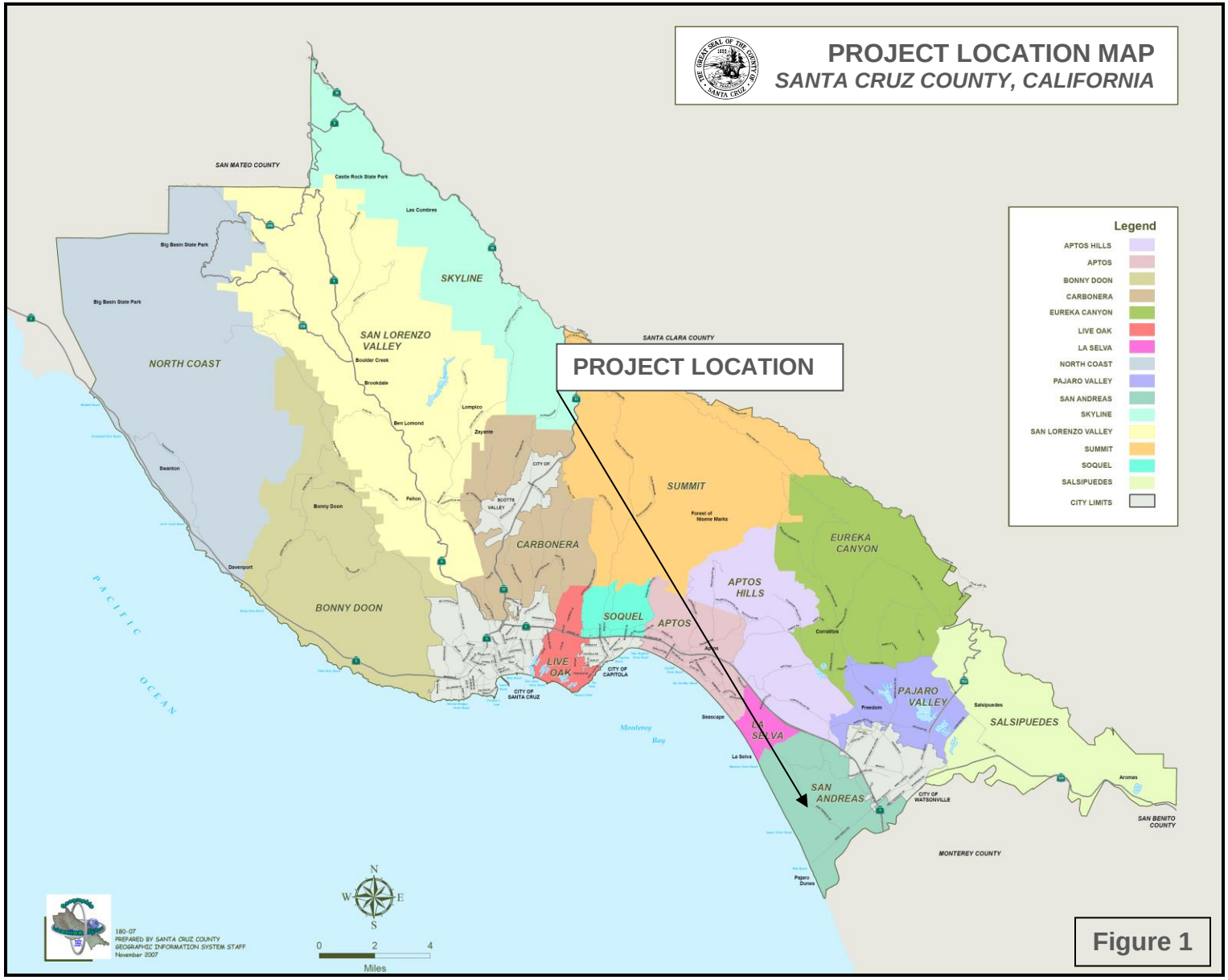
PROJECT LOCATION MAP
SANTA CRUZ COUNTY, CALIFORNIA
PROJECT LOCATION
Legend
APTOS HILLS
APTOS
BONNY DOON
CARBONERA
EUREKA CANYON
LIVE OAK
LA SELVA
NORTH COAST
PAJARO VALLEY
SAN ANDREAS
SKYLINE
SAN LORENZO VALLEY
SUMMIT
SOQUEL
SALSIPUEDES
CITY LIMITS
SAN MATEO COUNTY
SANTA CLARA COUNTY
MONTEREY COUNTY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

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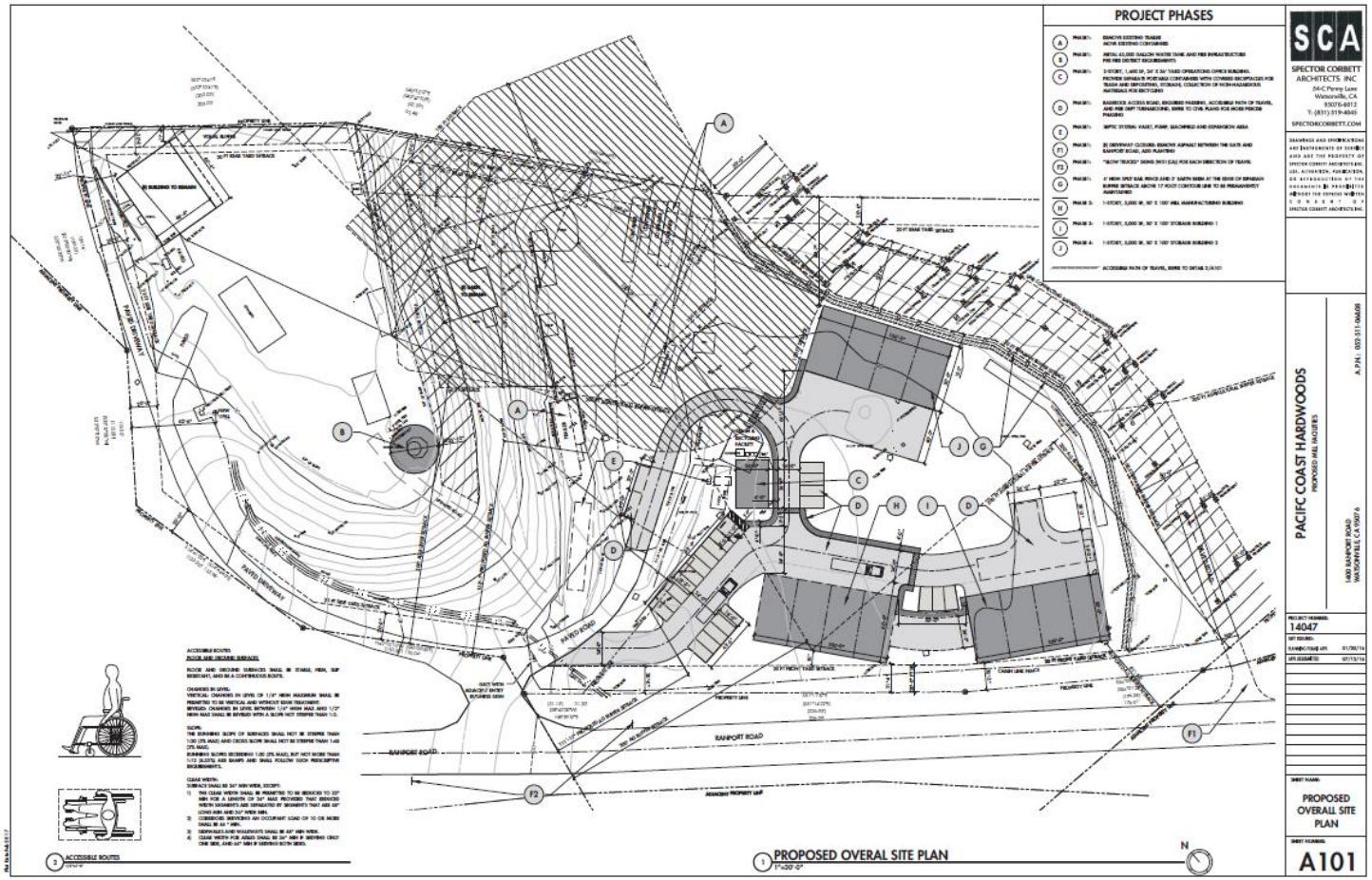

Figure 2: Project Site Plan

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II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS:

Parcel Size (acres):	~9 acres
Existing Land Use:	Commercial tree service
Vegetation:	Riparian
Slope in area affected by project:	☒ 0 - 30% ☐ 31 – 100% ☐ N/A
Nearby Watercourse:	Harkins Slough
Distance To:	Abuts the property

ENVIRONMENTAL RESOURCES AND CONSTRAINTS:

Water Supply Watershed:	No	Fault Zone:	No
Groundwater Recharge:	No	Scenic Corridor:	Highway 1
Timber or Mineral:	No	Historic:	No
Agricultural Resource:	Yes	Archaeology:	No resource found
Biologically Sensitive Habitat:	Yes	Noise Constraint:	No
Fire Hazard:	Low	Electric Power Lines:	No
Floodplain:	Yes	Solar Access:	Available
Erosion:	Yes	Solar Orientation:	Southern
Landslide:	No	Hazardous Materials:	Yes
Liquefaction:	Yes (part)	Other:	---

SERVICES:

Fire Protection:	Pajaro	Drainage District:	Outside
School District:	Pajaro	Project Access:	Ranport Rd
Sewage Disposal:	Septic	Water Supply:	Well

PLANNING POLICIES:

Zone District: Agriculture (A)		Special Designation: Watsonville Utility Prohibition (W) and Airport (AIA)
General Plan: Agriculture (AG)		
Urban Services Line:	☐ Inside	☒ Outside
Coastal Zone:	☒ Inside	☐ Outside

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

Natural Environment

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

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

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

PROJECT BACKGROUND:

The project site is located in the Coastal Zone on Ranport Road, directly adjacent and south of Highway 1 between Buena Vista Drive and Airport Boulevard. Commercial Agriculture (CA) and Agriculture (A) zoned parcels are located to the west, south, and east. A single-family dwelling is located directly northwest of the project site. Harkins Slough is located along the northern and eastern sides of the property. Directly to the north of the subject parcels is Highway 1, a designated scenic road in the County's General Plan.

The project site is composed of three parcels totaling about nine acres with two topographically distinct areas—the lower area, where the new lumber mill use would be primarily located, and an upper area that is used primarily for storage. The third parcel is located across Ranport Road and will not be actively used as a part of the lumber mill operation. All three parcels are zoned Agriculture (A) and have the Airport (AIA) combining district because of their proximity to the Watsonville Airport. The two larger parcels (-06 & -08) also have a combining district of Watsonville Utility Prohibition Combining District (W) which prohibits the extension of water and sewer utilities to serve new development[1].

The western parcel (APN 052-511-06) is divided into an upper and lower portion. The lower portion is developed with a trailer which is used as an office for a tree service business approved by the County's Zoning Administrator in 2011 under Permit 05-0062 (Williams Tree Service). A dilapidated barn used for storage is located on the hillside north of the trailer. On the upper

[1] The purpose of the W combining district is to prevent the provision of urban services to undeveloped/rural areas west of the City of Watsonville as a means to discourage urban development in the farmlands and environmentally sensitive areas in the Coastal Zone west of Watsonville. The proposed development will rely on a well and on-site septic, so no extension of urban services is proposed.

level in the northern corner of the parcel, is another old storage building. Throughout the property is a variety of vehicles, equipment, and construction materials. Lines of trees along the Highway 1 property line and along Ranport Road provide screening of the project site.

The eastern parcel (APN 052-511-08) is bound to the north and east by Harkins Slough. Most of the area outside of the Harkins Slough floodplain is covered with downed trees, brush piles, equipment and three shipping containers located along the northern property line. A small wetland is located to the east of the shipping containers. The three proposed lumbermill buildings and the office building would be located on this parcel.

Previous Use: The project site has a long history of previous commercial use. Western Farm Services (WFS), a Shell Chemical subsidiary, purchased the site in 1978. WFS stored and distributed pesticides and fertilizers for use on area farms, including the liquid pesticide fumigants dichloropropane-dichloropropene (D-D®) and Telone II. The fertilizer formerly stored and distributed at the facility is assumed to have been a nitrogen fertilizer due to the presence of nitrate as nitrogen presence in the subsurface soil. Shell Chemical sold the site to Herman Wilson, doing business as Western Farmco, Inc., in 1988. Pesticide and fertilizer storage and distribution operations ceased in 1996. In 1997, Western Farmco, Inc. merged with two other companies into WFS and WFS sold the property to Forrest Moore in 2001. Forrest Moore then sold the property to Dennis Williams in 2003 who then sold it to Richard Henry in 2019.

Sampling results indicate the presence of fertilizer and pesticide components, including 1,2-dichloropropane (1,2-DCP) in soil, groundwater, and soil vapor and nitrate in groundwater. Polychlorinated biphenyls (PCBs) and organochlorine pesticides in soils are present in a localized area near the former fertilizer storage tanks in the north central portion of the site. Site remedial activities began in the early 1980s and included subsurface investigation and over-excavation of an unlined disposal pit and rinse water pond. Additional investigations and remediation have included soil sampling, monitoring well installation, in-situ denitrification and soil flushing pilot testing, installation and operation of a groundwater injection/treatment system, and soil vapor sampling. Semiannual groundwater monitoring took place from 2003 to 20018, with an additional shallow well groundwater sampling occurring in 2016 and shallow and deep well groundwater sampling occurring in 2019 to investigate concentrations of 1,2,-DCP, nitrate as nitrogen, PCB congeners, benzene and 1,4-dioxane.

WFS stored pesticides and fuel in above ground storage tanks, as well as one underground gasoline storage tank. An unreported spill of D-D pesticide in 1979 released 1,2-DCP into soil and groundwater, and the use of unlined disposal and rinsing pits released additional pesticides and organic compounds into site soil and groundwater. PCBs were found in soil in 2014, the source of which remains unconfirmed after thorough investigation.

Shell has been working with the Regional Water Quality Control Board since 1980 to remove or reduce groundwater contamination to meet State water quality standards and with the Environmental Health Services Department (EHS) of Santa Cruz County since 2009 to investigate shallow soil and soil vapor to ensure that the site does not pose a significant risk to human health or wildlife. A deed restriction, recorded on the property on September 28, 2001, restricts the site as follows: (1) residential uses are prohibited; and (2) the use of the property as a distribution center for agricultural chemical and fertilizer products is prohibited.

DETAILED PROJECT DESCRIPTION:

The proposed project is to establish a specialty lumbermill on a site with an existing, permitted tree service operation. The project consists of four buildings and related improvements to be constructed in five phases. In the first phase, the existing trailer would be removed from the site and the storage containers would be moved. The driveway east of the main driveway on Ranport Road would be abandoned, and two "Slow Trucks" signs would be installed as directed by the Department of Public Works for either direction of traffic along Ranport Road. Phase One also includes the installation of site infrastructure, including about 900 cubic yards of grading (900 cubic yards fill and excavation), as well as the construction of the bathroom building and the restoration of the small wetland. The site infrastructure includes the parking area, driveways, accessible path of travel, fire turnaround, 45,000 gallon water storage for fire protection, trash and recycling receptacles, a four-foot high split rail fence and berm at the edge of the riparian buffer setback, and septic system (the well was previously installed). Until the mill building is constructed, milling would occur outside. The second phase would allow for the construction of a 5,000 square foot storage building, followed by a second 5,000 square foot storage building in the third phase. The fourth phase would be the construction of the mill building, and the final phase would be the construction of an office building to replace the bathroom building.

In terms of operations, the lumbermill would specialize in salvaged local trees brought down for purposes other than lumber harvests (e.g., trees removed to accommodate new development, storm damage, or orchard replanting). On occasion, when salvaged trees are not available, commercially harvested timber would be used. The resulting lumber would be sold online or to wholesale companies. Given this, no retail customers would come to the site. Off cuts and other waste from the lumbermill would be chipped. Chips would either be used for landscaping off-site or, if demand is low for chips, they would be eliminated by incinerating them in an air burner which would be brought on-site as needed.

Deliveries to the lumbermill would initially be made about once a week in box containers that are typically less than 22 feet in length. As the business grows, deliveries to the site may increase to once a day. Outgoing deliveries will be made on a flatbed truck or trailer of about

20 feet in length. The outgoing delivery schedule is anticipated to be about once a week initially, growing to once or twice a day as demand increases. The project site is located about 2,000 feet from the entrance/exit to Highway 1 which will minimize the project's impact on the nearby surface road network.

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

III. ENVIRONMENTAL REVIEW CHECKLIST

A. AESTHETICS AND VISUAL RESOURCES

Except as provided in Public Resources Code section 21099, would the project:

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

Discussion: Highway 1 is designated as a scenic road in the County's General Plan (General Plan Policy 5.10.10). General Plan Policy 5.10.2 (Development Within Visual Resource Areas) requires that projects visible from Highway 1 be subject to discretionary review. The proposed development would be visible from Highway 1 and is subject to discretionary review.

The view from Highway 1 to the subject parcel is partially screened by an existing line of oak and redwood trees. There are, however, gaps in the tree line where the project site is visible. The applicant provided a visual buffer planting plan prepared by Watsonville Wetlands Watch, updated June 2016 (Attachment 1) and also provided a visual simulation of the views from Highway 1 (Sheet A003). Additional landscaping would be provided to fill the existing gaps in the vegetative screen. The visual simulation indicates that in ten years, the site would be screened from Highway 1. In the interim, the applicant will clean up the site. There is currently a substantial amount of equipment and debris that, once cleaned up and with the proposed site plan, will substantially improve the aesthetics of the site. Given this, the cleanup and proposed landscape plan would reduce the visual impact to less than significant.

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

Discussion: Although Highway 1 is designated in the County's General Plan as a scenic resource (see response A.1. above), it is not a state scenic highway in this location. Given this, there will be no impact to scenic resources within a state scenic highway.

3.	*Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*	☐	☐	☒	☐

***Discussion*:** Views from Highway 1 are protected. General Plan Policy 5.10.12 requires that new development within the viewshed of a scenic road improve the visual quality through siting, architectural design, landscaping, and signage. The existing visual setting is degraded because the existing tree line does not fully block views to the site. The site itself is visually cluttered with brush piles, logs, equipment and buildings in varying levels of repair dispersed throughout the property. The proposed project would result in a substantially improved project site as the site would be cleaned up. New lumbermill buildings and an architect-designed office building along new internal roadways and parking areas would be provided. The project includes a visual simulation of the view from Highway 1 to the project site. With the implementation of the proposed landscape plan and ten years of growth, the site will be fully screened from Highway 1 and will comply with General Plan Policy 5.10.3 (Protection of Public Vistas). The project would be an improvement over the existing conditions and, as a result, the impact of the project would be less than significant.

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

***Discussion*:** The project would create an incremental increase in night lighting. However, this increase would be small, and would be similar in character to the lighting associated with the surrounding existing uses. As required by County Code, light sources will be shielded and directed away from neighboring properties.

B. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

***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*:** See discussion for B-1 above. In the Agriculture (A) zone district, lumber mills are an allowed use; therefore, there is no conflict with the existing zoning. Further, given the parcel's history of soil contamination, soil-based agriculture is inadvisable. No Williamson Act contract is in place. No impact would occur from project implementation.

3.	*Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*	☐	☐	☐	☒

***Discussion*:** The project is not located near land designated as Timber Resource. The nearest Timber Production-zoned parcel is over five miles away. Therefore, the project would not affect the resource or access to harvest the resource in the future. No impact is anticipated.

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

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

5.	*Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*	☐	☐	☒	☐

***Discussion*:** The project site is located in an area where there is both Unique Farmland and Farmland of Statewide Importance. There is Farmland of Statewide Importance approximately 650 feet away. This land is under active cultivation.

County Code 16.50.095 (Agricultural Buffer Setbacks) requires a 200-foot agricultural buffer between non-agricultural uses and parcels with an agricultural resource unless an agricultural buffer reduction is approved. The project includes a request to reduce the agricultural buffer setback from ten parcels. Of the ten neighboring parcels which were evaluated, six appear to be right-of-way related parcels; two appear to be used as residential parcels; one may have agricultural potential (APN 052-011-77), and one has an active agricultural use on it (APN 052-011-72). Although APN 052-011-72 has an active agricultural use on it, there is about 350 feet of existing natural vegetation and 82 feet of topographic difference. In addition to the approximately 180 feet of proposed agricultural buffer (i.e., a reduction of 20 feet), the vegetation and topographic difference provide an adequate buffer. The proposed agricultural buffer reductions were presented to the Agricultural Policy Advisory Commission (APAC) at their June 24, 2017, meeting. The Commission voted unanimously to recommend that the Zoning Administrator approve the agricultural buffer reductions.

The proposed use—a specialty lumbermill—is related to the current use of the subject parcel. As currently occurs with the existing tree service business, felled trees will be transported to the site where they will be processed. There is no evidence that the current use has resulted in the conversion of nearby agricultural lands into non-agricultural uses. Unlike residential development where residents unaccustomed to the dust, noise and smells of agriculture may put pressure on agriculture operations, the operator of the lumbermill is unlikely to be negatively affected by agriculture nuisances such as noise, dust, and odors. Regardless, the applicant will also be required to record a Statement of Acknowledgement regarding the issuance of a building permit in an area determined by the County of Santa Cruz to be subject to agricultural use conflicts.

Given the above considerations, no Prime Farmland, Unique Farmland, Farmland of Statewide, or Farmland of Local Importance would be converted to a non-agricultural use as a result of this project. In addition, the project site contains no forest land, and no forest land occurs within 5.4 miles of the proposed project site. Therefore, no impacts are anticipated.

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

C. AIR QUALITY

The significance criteria established by the Monterey Bay Air Resources District (MBARD)[2] has been relied upon to make the following determinations. Would the project:

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

***Discussion*:** The project would not conflict with or obstruct any long-range air quality plans of the MBARD. Because general construction activity related emissions (i.e., temporary sources) are accounted for in the emission inventories included in the air quality plans, impacts to air quality plan objectives are less than significant.

General estimated basin-wide construction-related emissions are included in the MBARD emission inventory (which, in part, form the basis for the air quality plans cited below) and are not expected to prevent long-term attainment or maintenance of the ozone and particulate matter standards within the North Central Coast Air Basin (NCCAB). Therefore, temporary construction impacts related to air quality plans for these pollutants from the project would be less than significant, and no mitigation would be required, since they are presently estimated and accounted for in the District's emission inventory, as described below. No stationary sources would be constructed that would be long-term permanent sources of emissions.

The project would result in new long-term operational emissions from vehicle trips (mobile emissions), the use of natural gas (energy source emissions), and consumer products, architectural coatings, and landscape maintenance equipment (area source emissions). Mobile source emissions constitute most operational emissions from this type of land use development project. However, emissions associated with buildout of this type of project is not expected to exceed any applicable MBARD thresholds. All of the lumbermill equipment will be compliant with emissions control requirements. The mill itself will be electric resulting in no emissions related to its use. Therefore, impacts to regional air quality as a result of long-term operation of the project would be less than significant.

Santa Cruz County is located within the NCCAB. The NCCAB does not meet state standards for ozone (reactive organic gases [ROGs] and nitrogen oxides [NOx]) and fine particulate matter (PM10). Therefore, the regional pollutants of concern that would be emitted by the project are ozone precursors and PM10.

The primary sources of ROG within the air basin are on- and off-road motor vehicles, petroleum production and marketing, solvent evaporation, and prescribed burning. The primary sources of NOx are on- and off-road motor vehicles, stationary source fuel combustion, and industrial processes. In 2010, daily emissions of ROGs were estimated at 63

[2] Formerly known as the Monterey Bay Unified Air Pollution Control District (MBUAPCD).

tons per day. Of this, area-wide sources represented 49%, mobile sources represented 36%, and stationary sources represented 15%. Daily emissions of NOx were estimated at 54 tons per day with 69% from mobile sources, 22% from stationary sources, and 9% from area-wide sources. In addition, the region is "NOx sensitive," meaning that ozone formation due to local emissions is more limited by the availability of NOx as opposed to the availability of ROGs (MBUAPCD, 2013b).

PM10 is the other major pollutant of concern for the NCCAB. In the NCCAB, highest particulate levels and most frequent violations occur in the coastal corridor. In this area, fugitive dust from various geological and man-made sources combines to exceed the standard. The majority of NCCAB exceedances occur at coastal sites, where sea salt is often the main factor causing exceedance. In 2005 daily emissions of PM10 were estimated at 102 tons per day. Of this, entrained road dust represented 35% of all PM10 emission, windblown dust 20%, agricultural tilling operations 15%, waste burning 17%, construction 4%, and mobile sources, industrial processes, and other sources made up 9% (MBUAPCD, 2008).

Given the modest amount of new traffic that would be generated by the project there is no indication that new emissions of ROGs or NOx would exceed MBARD 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 PM10. However, standard dust control best management practices (BMPs), such as periodic watering, would be implemented during construction to avoid significant air quality impacts from the generation of PM10.

Impacts

Construction

As required by the MBARD, construction activities (e.g., excavation, grading, on-site vehicles) which directly generate 82 pounds per day or more of PM10 would have a significant impact on local air quality when they are located nearby and upwind of sensitive receptors such as the Watsonville Community Hospital. Construction projects below the screening level thresholds shown in Table 1 (below) are assumed to be below the 82 lb/day threshold of significance, while projects with activity levels higher than those thresholds may have a significant impact on air quality. The proposed project would require about 900 cubic yards of grading, a relatively low amount considering the size of the development area. Although the project would produce PM10, it would be far below the 82 pounds per day threshold. This would result in less than significant impacts on air quality from the generation of PM10.

Table 1: Construction Activity with Potentially Significant Impacts from Pollutant PM10	
Activity	Potential Threshold*
Construction site with minimal earthmoving	8.1 acres per day
Construction site with earthmoving (grading, excavation)	2.2 acres per day

*Based on Midwest Research Institute, Improvement of Specific Emission Factors (1995). Assumes 21.75 working weekdays per month and daily watering of site.

Note: Construction projects below the screening level thresholds shown above are assumed to be below the 82 lb/day threshold of significance, while projects with activity levels higher than those above may have a significant impact on air quality. Additional mitigation and analysis of the project impact may be necessary for those construction activities.

Source: Monterey Bay Unified Air Pollution Control District, 2008.

Construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors, and front-end loaders that temporarily emit precursors of ozone (i.e., volatile organic compounds [VOC] or oxides of nitrogen [NOx]), are accommodated in the emission inventories of state- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone ambient air quality standard (AAQS) (MBUAPCD 2008).

Although not a mitigation measure per se (i.e., required by law), California ultralow sulfur diesel fuel with a maximum sulfur content of 15 ppm by weight will be used in all diesel-powered equipment, which minimizes sulfur dioxide and particulate matter.

MBARD recommends the use of the following BMPs for the control of short-term construction generated emissions, and they shall be implemented during all site excavation and grading.

Water all active construction areas at least twice daily as necessary and indicated by soil and air conditions.

- Prohibit all grading during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days)
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed areas.
- Haul trucks shall maintain at least 2' 0" freeboard.
- Cover all trucks hauling soil, sand, and other loose materials.

- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as quickly as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all existing trucks.
- Pave all roads on construction sites.
- Sweep streets, if visible soil material is carried out from the construction site.
- Post a publicly visible sigh which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and corrective action within 48 hours. The phone number of the Monterey Bay Air Resources District shall be visible to ensure compliance with Rule 402 (Nuisance),
- Limit the area under construction at any one time.

Implementation of the above recommended BMPs for the control of construction-related emissions would further reduce construction-related particulate emissions. These measures are not required by MBARD or as mitigation measures, as the impact would be less than significant without mitigation. These types of measures are commonly included as conditions of approval associated with development permits approved by the County.

One of the by-products of the lumbermill will be off-cuts and wood chips. When demand for wood chips for use in landscaping is low, an air curtain burner will be used. Air curtain burners, also called air curtain incinerators, or by the company name Air Burner, were designed as a pollution-control device for open burning. The primary objective of an air curtain machine is to reduce the particulate matter (PM), or smoke, which results from burning clean wood waste. Using a technology called "air curtain," the smoke particles are trapped and reburned, reducing them to an acceptable limit. This technology is endorsed by Cal-Fire (see: https://www.fire.ca.gov/media/umkhhdbs/fuels-reduction-guide-final-2021-print.pdf, page 19). Given this, the impact of burning off cuts and woodchips in the air curtain burner will be less than significant.

2. *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?*	☐	☐	☒	☐

***Discussion*:** The primary pollutants of concern for the NCCAB are ozone and PM10, as those are the pollutants for which the district is in nonattainment. Project construction would have a limited and temporary potential to contribute to existing violations of California air quality standards for ozone and PM10 primarily through diesel engine exhaust and fugitive dust. The criteria for assessing cumulative impacts on localized air quality are the same as those for assessing individual project impacts. Projects that do not exceed MBARD's

construction or operational thresholds and are consistent with the AQMP would not have cumulatively considerable impacts on regional air quality (MBARD, 2008). Because the project would not exceed MBARD's thresholds and is consistent with the AQMP, there would not be cumulative impacts on regional air quality.

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

***Discussion*:** Watsonville Community Hospital, the closest land use supporting sensitive receptors, is located approximately one-half mile east of the project site.

The construction of the proposed specialty lumbermill project would not generate substantial pollutant concentrations. Emissions from construction activities represent temporary impacts that are typically short in duration. Impacts to sensitive receptors would be less than significant.

Diesel exhaust contains substances (diesel particulate matter [DPM], toxic air contaminants [TACs], mobile source air toxics [MSATs]) that are suspected carcinogens, along with pulmonary irritants and hazardous compounds, which may affect sensitive receptors such as young children, senior citizens, or those susceptible to respiratory disease. Where construction activity occurs in proximity to long-term sensitive receptors, a potential could exist for unhealthful exposure of those receptors to diesel exhaust, including residential receptors.

The site is located on the list of hazardous sites in Santa Cruz County compiled pursuant to Government Code section 65962.5. As described above, the site was the location of Western Farm Services, Inc. (WFS), a Shell Chemical subsidiary, and was used to store and distribute pesticides and fertilizers. Sampling results indicate the presence of fertilizer and pesticide components, including 1,2-DCP in soil, groundwater, and soil vapor and nitrate in groundwater. Polychlorinated biphenyls (PCBs) and organochlorine pesticides in soil are present in a localized area near the former fertilizer storage tanks in the north central portion of the site. To address any potential exposure risks associated with grading and construction work, either through surface or airborne contact, a soil management plan entitled *Revised Subsurface Media Management* Plan, dated May 27, 2020 was prepared. See section "I. Hazards and Hazardous Materials" for additional information and related mitigations.

Impacts

The project is located in the community of Watsonville and the Watsonville Community Hospital would be as close as about one half-mile from the project area. Since construction is anticipated to occur over a 20-week period, the sensitive receptors would be affected for a maximum of 20 weeks, which is less than .55% of the 70-year maximum exposed individual

criteria used for assessing public health risk due to emissions of certain air pollutants (MBUAPCD 2008).

Due to the intermittent and short-term temporary nature of construction activities (i.e., 20 weeks), emissions of DPM, TACs, or MSATs would not be sufficient to pose a significant risk to sensitive receptors from construction equipment operations during the course of the project.

The project would not be expected to expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

***Discussion*:** Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses that would be associated with objectionable odors. Odor emissions from the proposed project would be limited to odors associated with vehicle and engine exhaust and idling from cars entering, parking, and exiting the facility. The project does not include any known sources of objectionable odors associated with the long-term operations phase.

During construction activities, only short-term, temporary odors from vehicle exhaust and construction equipment engines would occur. California ultralow sulfur diesel fuel with a maximum sulfur content of 15 ppm by weight would be used in all diesel-powered equipment, which minimizes emissions of sulfurous gases (sulfur dioxide, hydrogen sulfide, carbon disulfide, and carbonyl sulfide). As the project site is in a coastal area that contains coastal breezes off of the Monterey Bay, construction-related odors would disperse and dissipate and would not cause substantial odors at the closest sensitive receptors (located approximately one-half mile east of the project site). Construction-related odors would be short-term and would cease upon completion. Therefore, no objectionable odors are anticipated from construction activities associated with the project.

The project would not create objectionable odors affecting a substantial number of people; therefore, the project is not expected to result in significant impacts related to objectionable odors during construction or operation.

D. BIOLOGICAL RESOURCES

Would the project:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate,	☐	☒	☐	☐

sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or U.S. Fish and Wildlife Service?

Discussion: The project site is located in an area of biotic concern. A biotic report was prepared for this project by Biotic Resources Group, dated October 20, 2016 (Attachment 2), This report has been reviewed and accepted by the Planning Department Environmental Section (Attachment 3). The biotic report determined that habitat for migratory birds, red-legged frog, and western pond turtle potentially occurs on the project site and recommends avoidance and minimization measures for protection of these species and/or their habitat. An overview of these species and potential project related impacts is included with Attachment 2. The avoidance and minimization measures in the biotic report, and conditions of approval in the County biotic approval letter have been incorporated into the mitigation measures below to reduce project related impacts to less than significant.

Impacts

As noted, the biotic report identifies the potential presence of California red-legged frogs (CRLF), western pond turtles, and migratory birds, as having the potential to be impacted as a result of construction activities. To ensure to take of these protected species occurs, the following measures shall be incorporated into conditions of approval for this project:

Migratory Birds

Migratory birds are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10 including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). All migratory bird species are protected by the MBTA. Any disturbance that causes direct injury, death, nest abandonment, or forced fledging of migratory birds, is restricted under the MBTA. Any removal of active nests during the breeding season or any disturbance that results in the abandonment of nestlings is considered a "take" of the species under federal law.

Impact BIO-1. If any trees must be removed or trimmed to implement the proposed lumber project, nesting migratory birds may potentially be destroyed or disturbed.

Mitigation Measure BIO-1. Schedule tree removal or trimming to occur between August 1 and March 1 of any given year. If that is not practical, then a qualified biologist shall conduct surveys for nesting birds no more than 14 days prior to tree removal or trimming. If nesting birds are observed in the trees scheduled for removal or trimming, then the

removal or trimming shall be postponed until the biologist determines that all chicks have fledged the nest.

Red-legged Frog & Pond Turtle

The California red-legged frog (*Rana draytonii*) is a federally threatened species and California species of special concern. This frog historically ranged from Marin County southward to northern Baja California. Presently, Monterey, San Luis Obispo, and Santa Barbara counties support the largest remaining California red-legged frog populations in California. The project site is included in the Designated Critical Habitat (Unit SCZ-2) for the California red-legged frog. Critical habitat receives additional protection when the project meets two condition: 1) There is a federal nexus involved in the project; and 2) the project area contains the Primary Constituents Elements (PCEs) as listed in the federal register notice. The proposed project does not involve any federal nexus, and the proposed project development area does not contain any of the PCEs for the California red-legged frog.

The western pond turtle (*Emys marmorata*) is a California species of special concern. Although the biotic report did not identify suitable habitat within the project area, the reptile may occasionally utilize the portion of Harkins Slough on the eastern edge of the property as a movement corridor.

Impact BIO-2. Preparation of the site for construction of the proposed lumber mill facilities has the potential to injure or kill California red-legged frogs or pond turtles, if any are present during stripping and grading or other ground disturbance. Both the frog and the turtle are closely tied to their aquatic habitats, but are able to traverse disturbed and open areas (such as the existing Williams Tree Service operational areas), usually during the rainy season, during movements to/from breeding ponds to summer foraging sites (e.g. creeks).

Mitigation Measure BIO-2. A qualified biologist shall conduct preconstruction surveys of the disturbance area for red-legged frogs and pond turtles no more than 48 hours prior to commencement of ground disturbance, using both a daytime and nighttime survey protocol. If red-legged frogs are observed, construction will be postponed until monitoring by the biologist confirms that the frog has left the work area of its own accord. In this case, the biologist will be required to clear the project site each morning prior to initiation of construction activities. If that is not practical, then the applicant shall immediately contact the USFWS regarding red-legged frog, and for pond turtles contact the CDFW. No frogs or turtles shall be relocated unless approved by USFWS and CDFW, respectively. If no frogs or turtles are found in the disturbance area during the day and night surveys, no further surveying will be required unless either species is encountered during construction.

Mitigation Measure BIO-3. The project biologist shall present a tail-gate type worker educational session just prior to commencement of ground disturbance. The educational session should contain a brief ecology of the red-legged frog and pond turtle, photos, measures to avoid any potential impacts to the species, and their protected status. Flyers or books with this information may be used for the presentation.

With these mitigations, impacts will be reduced to less than significant.

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

***Discussion*:** The project site is located in an area of biotic concern. The eastern portion of the lower parcel (APN 052-511-08) is part of the upper section of Harkins Slough. In this area, Harkin Slough flows as a stream within Larkin Valley and crosses under Highway 1 in a culvert. On the south side of Highway 1, it emerges onto the subject parcel and continues as a riparian forest-lined creek channel which continues until Ranport Road where it opens into a low-gradient, perennially open water slough (Biotic Resources 2016). In addition, a small drainage swale is located along the northwest property line of APN 052-511-08. A wetland delineation was conducted for the swale (Attachment 4), and a 20-foot-long section was found to meet the criteria for a wetland.

An overview of sensitive natural communities in and adjacent to the project area, including discussion of potential project related impacts, is included below.

Riparian Woodland

Riparian woodland occurs along the banks of Harkins Slough in the project area. The woodland is dominated by arroyo willow, yellow willow, California blackberry, stinging nettle, and poison oak. In addition, the riparian area supports water smartweed, water hemlock, velvet grass, poison hemlock, periwinkle, and Himalaya berry, with the latter three being invasive, non-native species (Biotic Resources Group 2016). Riparian woodland is considered a sensitive natural community by the California Department of Fish and Wildlife (CDFW) and is regulated under the California Fish and Game Code section 1600 regarding lake and streambed alteration agreements. The riparian woodland in the project area falls within the CDFW stream zone, which extends laterally to the outer edge of riparian vegetation. In addition, riparian habitat is granted further protections under the County's

Sensitive Habitat Protection and Riparian Corridor and Wetlands Protection ordinances (SCCC 16.30 and 16.32). Although the proposed project is located outside of the riparian woodland and respects the 50-foot riparian buffer required by County Code 16.30.040, fugitive light from the development could affect the riparian corridor.

Impact BIO-3. The development area is adjacent to a riparian corridor, which could be adversely affected by a new or additional source of light that is not adequately deflected or minimized.

The following mitigation measures would reduce significant impacts to a less than significant level.

Impact BIO-4. Exterior lighting of the proposed new lumber mill facilities has the potential to disturb riparian species, as well as other more common wildlife.

Mitigation Measure BIO-4: In order to mitigate impacts from a new light source, prior to final approval plans shall be revised to comply with the following requirements:

a) All site, building, security and landscape lighting shall be directed onto the site and away from riparian areas.
b) Area lighting shall be high-pressure sodium vapor, metal halide, fluorescent, or equivalent energy-efficient fixtures.
c) All lighted parking and circulation areas shall utilize low-rise light standards. Light standards to a maximum height of 15 feet are allowed.
d) Security lighting shall be on a timer and/or motion sensor.

With this mitigation, project impacts from lighting would be less than significant.

3.	*Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*	☐	☐	☒	☐

***Discussion*:** A jurisdictional delineation report was prepared by Biotic Resources Group dated October 6, 2016 (Attachment 4). The report identified a total of 50 square feet (20 linear feet) of federally defined wetlands, located with an intermittent/perennial riparian corridor, in the study area. Wetlands may be subject to regulation as Waters of the State by the Regional Water Quality Control Board (RWQCB). Wetlands are granted further protections under the County's Sensitive Habitat Protection and Riparian Corridor and

Wetlands Protection ordinances (SCCC 16.30 and 16.32). In order to conduct work within 100 feet of a wetland, the project must be granted a riparian exception. In this case, the project would avoid the wetland other than the required restoration of it. Watsonville Wetlands Watch prepared "Plan for Riparian Habitat Restoration Buffer and Visual Buffer Planting" (Updated June 2016, Attachment 1) which will be implemented as a condition of approval. As noted previously, a hazardous spill occurred on the project site decades ago. As a part of the hazardous materials clean up (see section "I. Hazards and Hazardous Materials" below), the top six inches of soil are required to be removed from the wetland area. Typically, work within a wetland requires a County-issued riparian exception in conformance Title 16 of the County Code. However, the code exempts restoration from requiring a riparian exception; therefore, no riparian exception is required, and the impact would be less than significant.

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

Discussion: As discussed in D-1 above, migratory birds could be affected by the project and Mitigation Measure Bio-1 would reduce the potential impact to less than significant. In addition, D-1 notes that the red-legged frog and western pond turtle could traverse the parcel, potentially exposing them to injury or death. Mitigation Measures Bio-2 and Bio-3 would reduce the potential impact to less than significant.

5.	*Conflict with any local policies or ordinances protecting biological resources (such as the Sensitive Habitat Ordinance, Riparian and Wetland Protection Ordinance, and the Significant Tree Protection Ordinance)?*	☐	☐	☒	☐

Discussion: The project would not conflict with any local policies or ordinances. A biotic report and wetland delineation was prepared for the project (Attachment 2 and 4) and the County accepted the reports (Attachment 3). The project is therefore consistent with the County of Santa Cruz Riparian Corridor and Wetlands Protection Ordinance as well as the Sensitive Habitat Ordinance. Impacts from project implementation would be less than significant with mitigations incorporated.

6.	*Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other*	☐	☐	☐	☒

approved local, regional, or state habitat conservation plan?

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

E. CULTURAL RESOURCES

Would the project:

1.	*Cause a substantial adverse change in the significance of a historical resource pursuant to 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. As a result, no impacts to historical resources would occur from project implementation.

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

Discussion: According to the Archeological Survey Report prepared by Santa Cruz Archaeological Society, dated February 21, 2005, there is no evidence of pre-historic cultural resources. This survey was prepared for application 05-002 (Williams Tree Service Permit); site conditions have not changed in such manner that an update would be required. Impacts are expected to be less than significant. Pursuant to section 16.40.040 of the SCCC, if archaeological resources are uncovered during construction, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in SCCC Chapter 16.40.

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

Discussion: Impacts are expected to be less than significant. However, pursuant to section 16.40.040 of the SCCC, and California Health and Safety Code sections 7050.5-7054, 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

archaeological report shall be prepared, and representatives of local Native American Indian groups shall be contacted. If it is determined that the remains are Native American, the Native American Heritage Commission will be notified as required by law. The Commission will designate a Most Likely Descendant who will be authorized to provide recommendations for management of the Native American human remains. Pursuant to Public Resources Code section 5097, the descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. Disturbance shall not resume until the significance of the resource is determined and appropriate mitigations to preserve the resource on the site are established.

F. ENERGY

Would the project:

1.	*Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*	☐	☐	☒	☐

Discussion: The project, like all development, would be responsible for an incremental increase in the consumption of energy resources during site grading and construction due to the use onsite of construction equipment, materials processing, and potential traffic delay resulting from construction traffic. All project construction equipment would be required to comply with the California Air Resources Board (CARB) emissions requirements for construction equipment, which includes measures to reduce fuel-consumption, such as imposing limits on idling and requiring older engines and equipment to be retired, replaced, or repowered. In addition, the project would comply with General Plan policy 8.2.2, which requires all new development to be sited and designed to minimize site disturbance and grading. As a result, impacts associated with the small temporary increase in consumption of fuel during construction are expected to be less than significant.

The project involves the establishment of a small scale lumbermill. No significant impacts are expected from project implementation. Therefore, the project will not result in wasteful, inefficient, or unnecessary consumption of energy resources.

In addition, the County has strategies to help reduce energy consumption and greenhouse gas (GHG) emissions. These strategies included in the *County of Santa Cruz Climate Action Strategy* (County of Santa Cruz, 2013) are outlined below.

Strategies for the Reduction of Energy Use and GHG Emissions

- Develop a Community Choice Aggregation (CCA) Program, if feasible.[3]
- Increase energy efficiency in new and existing buildings and facilities.
- Enhance and expand the Green Business Program.
- Increase local renewable energy generation.
- Public education about climate change and impacts of individual actions.
- Continue to improve the Green Building Program by exceeding the minimum standards of the state green building code (Cal Green).
- Form partnerships and cooperative agreements among local governments, educational institutions, nongovernmental organizations, and private businesses as a cost-effective way to facilitate mitigation and adaptation.
- Reduce energy use for water supply through water conservation strategies.

Strategies for the Reduction of Energy Consumption and GHG Emissions from Transportation

- Reduce vehicle miles traveled (VMT) through County and regional long-range planning efforts.
- Increase bicycle ridership and walking through incentive programs and investment in bicycle and pedestrian infrastructure and safety programs.
- Provide infrastructure to support zero and low emissions vehicles (plug in, hybrid plug-in vehicles).
- Increase employee use of alternative commute modes: bus transit, walking, bicycling, carpooling, etc.
- Increase the number of electric and alternative fuels vehicles in the County fleet.
- Therefore, the project will not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts are expected to be less than significant.

2.	*Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*	☐	☐	☐	☒

Discussion: AMBAG's 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) recommends policies that achieve statewide goals established by CARB, the California Transportation Plan 2040, and other transportation-related policies and state senate bills. The SCS element of the MTP targets transportation-related greenhouse gas (GHG) emissions in particular, which can also serve to address energy use by coordinating

[3] Monterey Bay Community Power (MBCP) was formed in 2017 to provide carbon-free electricity. All Pacific Gas & Electric Company (PG&E) customers in unincorporated Santa Cruz County were automatically enrolled in the MBCP in 2018.

land use and transportation planning decisions to create a more energy efficient transportation system.

The Santa Cruz County Regional Transportation Commission (SCCRTC) prepares a County-specific regional transportation plan (RTP) in conformance with the latest AMBAG MTP/SCS. The 2040 RTP establishes targets to implement statewide policies at the local level, such as reducing vehicle miles traveled and improving speed consistency to reduce fuel consumption.

In 2013, Santa Cruz County adopted a Climate Action Strategy (CAS) focused on reducing the emission of greenhouse gases, which is dependent on increasing energy efficiency and the use of renewable energy. The strategy intends to reduce energy consumption and greenhouse gas emissions by implementing a number of measures such as reducing vehicle miles traveled through County and regional long-range planning efforts, increasing energy efficiency in new and existing buildings and facilities, increasing local renewable energy generation, improving the Green Building Program by exceeding minimum state standards, reducing energy use for water supply through water conservation strategies, and providing infrastructure to support zero and low emission vehicles that reduce gasoline and diesel consumption, such as plug in electric and hybrid plug in vehicles.

In addition, the Santa Cruz County General Plan has historically placed a priority on "smart growth" by focusing growth in the urban areas through the creation and maintenance of an urban services line. Objective 2.1 (Urban/Rural Distinction) directs most residential development to the urban areas, limits growth, supports compact development, and helps reduce sprawl. The Circulation Element of the General Plan further establishes a more efficient transportation system through goals that promote the wise use of energy resources, reducing vehicle miles traveled, and transit and active transportation options.

Energy efficiency is a major priority throughout the County's General Plan. Measure C was adopted by the voters of Santa Cruz County in 1990 and explicitly established energy conservation as one of the County's objectives. The initiative was implemented by Objective 5.17 (Energy Conservation) and includes policies that support energy efficiency, conservation, and encourage the development of renewable energy resources. Goal 6 of the Housing Element also promotes energy efficient building code standards for residential structures constructed in the County.

The project will be consistent with the AMBAG 2040 MTP/SCS and the SCCRTC 2040 RTP. The project would also be required to comply with the Santa Cruz County General Plan and any implemented policies and programs established through the CAS. In addition, the project

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

design would be required to comply with CALGreen, the state of California's green building code, to meet all mandatory energy efficiency standards. Therefore, the project would not conflict with or obstruct any state or local plan for renewable energy or energy efficiency.

G. GEOLOGY AND SOILS

Would the project:

1.	*Directly or indirectly cause 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)*:** 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. A geotechnical investigation for the proposed project was performed by Yvette Wilson of Rock Solid Engineering, Inc., dated November 2014 (Attachment 5). The report evaluated ground shaking, surface rupture, landslides and liquefaction hazards. The report concludes that: all proposed structures will be designed with the appropriate design parameters in accordance with the California Building Code; surface rupture potential is low since surface rupture usually occurs over previous fault lines; and the risk of a landslide is low given the absence of any mapped landslides on the subject parcel and the relatively level area of development. The parcel is, however, susceptible to liquefaction during seismic events. To address this hazard, the report recommends that the foundation system for the proposed building be composed of helical screw piles that extend below the liquefiable stratum and peat layers. The County accepted the geotechnical report with the requirement that all

construction comply with the recommendations of the soils report (Letter by Carolyn Burke, dated August 15, 2016, Attachment 6). Given this the recommended helical screw pile foundation will be incorporated as a part of the project.

2.	*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 the area of construction has relatively flat topography and standard erosion controls are a required condition of the project. Prior to approval of a grading or building permit, the project must have an approved stormwater pollution control plan (SCCC Section 7.79.100), which would specify detailed erosion and sedimentation control measures. The plan would include provisions for disturbed areas to be planted with ground cover and to be maintained to minimize surface erosion. Impacts from soil erosion or loss of topsoil would be considered less than significant.

3.	*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 report cited above (see Discussion under G-1) concluded that there is a potential risk from liquefaction. The recommendations contained in the geotechnical report, specifically the use of helical screw pile foundations, will be implemented to reduce this potential hazard to a less than significant level.

4.	*Be located on expansive soil, as defined in section 1803.5.3 of the California Building Code (2016), creating substantial direct or indirect risks to life or property?*	☐	☐	☒	☐

***Discussion*:** The geotechnical report for the project did not identify any elevated risk associated with expansive soils. Therefore, no impact is anticipated.

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

***Discussion*:** The project would use an onsite sewage disposal system, and County Environmental Health Division has confirmed that additional soil testing will be required to

determine if the previous submitted design will meet current code standards. Enhanced Treatment may be required. If Enhanced Treatment is required, the property owner will be required to obtain approval for a County septic permit and enroll in the State's Waste Discharge Requirement General Order No. WQ 2014-0153. The project will not be issued a building permit until a County septic permit is issued and enrollment in the State program occurs. Impacts are anticipated to be less than significant since no building permit will be issued until a compliant septic system is proposed and permitted.

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

***Discussion*:** No unique paleontological resources or sites or unique geologic features are known to occur in the vicinity of the project. A query was conducted of the mapping of identified geologic/paleontological resources maintained by the County of Santa Cruz Planning Department, and there are no records of paleontological or geological resources in the vicinity of the project parcel. No direct or indirect impacts are anticipated.

H. 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 project, like all development, would be responsible for an incremental increase in greenhouse gas (GHG) emissions by usage of fossil fuels during the site grading and construction. In 2013, Santa Cruz County adopted a Climate Action Strategy (CAS) intended to establish specific emission reduction goals and necessary actions to reduce greenhouse gas levels to pre-1990 levels as required under Assembly Bill (AB) 32 legislation. The strategy intends to reduce GHG 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. Implementing the CAS, the MBCP was formed in 2017 to provide carbon-free electricity. All PG&E customers in unincorporated Santa Cruz County were automatically enrolled in the MBCP in 2018. All project construction equipment would be required to comply with the CARB emissions requirements for construction equipment. Further, all new buildings are required to meet the State's CalGreen building code. As noted above, an air curtain burner may be used to incinerate off-cuts and wood chips. Air curtain burns are accepted by Cal-Fire as a preferred method of eliminating wood waste. As a result, impacts associated with the temporary increase in GHG emissions are expected to be less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 H-1 above. No significant impacts are anticipated.

I. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

1. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*	☐	☐	☒	☐

Discussion: The project would not create a significant hazard to the public or the environment. No routine transport or disposal of hazardous materials is proposed. However, during construction, fuel would be used at the project site. In addition, fueling may occur within the limits of the staging area proposed to be located on site. Best management practices would be used to ensure that no impacts would occur. Impacts are expected to be less than significant.

2. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*	☐	☐	☒	☐

Discussion: See discussion under I-1 above. Project impacts would be considered less than significant.

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

Discussion: There are no schools in the within one-quarter of a mile. Three schools are located in relative proximity to the project site. Pajaro Valley High School is located about .95 mile to the south at 500 Harkins Slough Road. Cesar E. Chavez Middle School is located about 1.75 miles to the east at 440 Arthur Road in Watsonville. Amesti Elementary School is located at 25 Amesti Road in the City of Watsonville which is located approximately 2.2 miles to the northeast of the project site. Although fueling of equipment is likely to occur within the staging area, BMPs to contain spills would be implemented. No impacts are anticipated.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 site is located on the list of hazardous sites in Santa Cruz County compiled pursuant to Government Code section 65962.5. As described above, the site was the location of Western Farm Services, Inc. (WFS), a Shell Chemical subsidiary, and was used to store and distribute pesticides and fertilizers. Sampling results indicate the presence of fertilizer and pesticide components, including 1,2-DCP in soil, groundwater, and soil vapor and nitrate in groundwater. Polychlorinated biphenyls (PCBs) and organochlorine pesticides in soil are present in a localized area near the former fertilizer storage tanks in the north central portion of the site.

Site remedial activities began in the early 1980s and included subsurface investigation and over-excavation of an unlined disposal pit and rinse water pond. Additional investigations and remediation have included soil sampling, monitoring well installation, in-situ denitrification and soil flushing pilot testing, installation and operation of a groundwater injection/treatment system, and soil vapor sampling. Semiannual groundwater monitoring took place from 2003 to 2008, with an additional shallow well groundwater sampling even in 2016 and a shallow and deep well groundwater sampling event in 2019 to investigate concentrations of 1,2-DCP, nitrate as nitrogen, PCB congeners, benzene, and 1,4-dioxane (Attachment 7).

<u>Impacts</u>

PCB and pesticide impacted soil remain near the former fertilizer storage tank area between 1.5 and 9.5 feet below, but pose no risk for the current site use. Risks to human health and the environment during the proposed site redevelopment were evaluated. It was determined that soils in the former fertilizer storage tank area have elevated concentrations of PCBs and dieldrin and must be mitigated if soils are brought to the surface. Unacceptable risks to commercial and construction works are present if soils from between 2 and 9.5 feet below grade are brought to the surface and left accessible for 250 days per year for construction workers or for 25 years for commercial workers. If soils from below 1.5 feet below grade are brought to the surface for extended periods of time, there are potential hazards to ecological receptors. In addition, if soils from 2 to 9.5 feet below grade are brought to the surface, there are potential future ecological risks associated with exposure to the proposed soil/wetland sediment.

In addition, there may be a human health risk associated with vapor intrusion into the former office/maintenance building (upper terrace location) and the office trailer (lower terrace

location) as both are within 100 lateral feet of the 1,2-DCP and benzene soil gas plume, and for the former office/maintenance building, 1,3-butadiene plume. To date, Shell has no evaluated these two structures, but is required to re-evaluate the site and buildings with current applicable soil gas and indoor air screening levels. Neither of these structures would be a part of the proposed lumbermill operation.

Impact HAZ-1. Soils disturbed during the redevelopment of the site pose risks to human health and the environment.

Mitigation Measure HAZ-1. To mitigate the potential impacts associated with the proposed site redevelopment as a lumbermill, the project must comply with the most current regulatory approved version of the *Revised Subsurface Media Management Plan,* current version dated May 27, 2020 (Attachment 8).

Impact HAZ-2. Contamination in the soil may manifest as vapor which could intrude into the existing former office/maintenance building and office trailer.

Mitigation Measure HAZ-2. To address the potential impact of vapor intrusion, the office trailer shall be removed from the project site. The office/maintenance building shall not be used as a part of the lumbermill operations.

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 or excessive noise for people residing or working in the project area?*	☐	☐	☒	☐

***Discussion*:** The project is located about 750 feet of the southeastern end of the Watsonville Municipal Airport with Highway 1 located between the airport and the project site. According to the General Plan Figure 9-4, "Future Watsonville Municipal Airport Noise Contours for the Year 2020," the proposed lumbermill would be located within the 55dB CNEL aircraft noise contour. This exposure level complies with General Plan Figure 9-2 "Acceptable through Unacceptable Ranges of Noise Exposure by Land Use," which categorizes noise up to 70dB DNL or CNEL for industrial and manufacturing land uses as "normally acceptable." In addition, the proposed lumbermill will be composed of single-story buildings with the exception of the office building to be constructed in the final phase. The office building would be 24 feet tall. Because the location of the lumbermill is below the grade of Highway 1 at an elevation of 22 feet, and the airport parcel is at about 130 feet, the lumbermill structures will pose no safety hazard to planes (Source of elevations: County GIS). Therefore, the project would not result in a safety hazard or excessive noise for people

residing or working in the project area. Impacts would be less than significant using standard construction practices.

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

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

7.	*Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*	☐	☐	☒	☐

Discussion: See discussion under Wildfire Question T-2. Impacts would be less than significant.

J. HYDROLOGY, WATER SUPPLY, AND WATER QUALITY

Would the project:

1.	*Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*	☐	☐	☒	☐

Discussion: The project is located adjacent to Harkins Slough and has the potential to generate water quality impacts during construction. As noted under section I. 4. And Mitigation Measure HAZ-1, in order to ensure that no human health or ecological impacts result from soil disturbance, compliance with the *Revised Subsurface Media Management Plan,* dated May 27, 2020 (Attachment 8) is required.

In addition, to address standard concerns about erosion during construction, an erosion control plan is required per section 16.22.060 of the SCCC.

The following water quality protection and erosion and sediment control BMPs will be implemented, based on standard County requirements, to minimize construction-related contaminants and mobilization of sediment to Harkins Slough.

The BMPs will be selected to achieve maximum sediment removal and represent the best available technology that is economically achievable and are subject to review and approval by the County. The County will perform routine inspections of the construction area to

verify the BMPs are properly implemented and maintained. The County will notify contractors immediately if there is a noncompliance issue and will require compliance.

The BMPs will include, but are not limited to, the following.

- All earthwork or foundation activities involving rivers, ephemeral drainages, and culverts, will occur in the dry season (generally between June 1 and October 15).
- Equipment used in and around drainages and wetlands will be in good working order and free of dripping or leaking engine fluids. All vehicle maintenance will be performed at least 300 feet from all drainages and wetlands. Any necessary equipment washing will be carried out where the water cannot flow into drainages or wetlands.
- Develop a hazardous material spill prevention control and countermeasure plan before construction begins that will minimize the potential for and the effects of hazardous or toxic substances spills during construction. The plan will include storage and containment procedures to prevent and respond to spills and will identify the parties responsible for monitoring the spill response. During construction, any spills will be cleaned up immediately according to the spill prevention and countermeasure plan. The County will review and approve the contractors' toxic materials spill prevention control and countermeasure plan before allowing construction to begin. Prohibit the following types of materials from being rinsed or washed into the riparian areas, streets, shoulder areas, or gutters: concrete; solvents and adhesives; thinners; paints; fuels; sawdust; dirt; gasoline; asphalt and concrete saw slurry; heavily chlorinated water.
- Any surplus concrete rubble, asphalt, or other rubble from construction will be taken to a local landfill.
- An erosion and sediment control plan will be prepared and implemented for the project. It will include the following provisions and protocols. The Storm Water Pollution Prevention Plan (SWPPP) for the project will detail the applications and type of measures and the allowable exposure of unprotected soils.
    - Discharge from dewatering operations, if needed, and runoff from disturbed areas will be made to conform to the water quality requirements of the waste discharge permit issued by the RWQCB.
    - Temporary erosion control measures, such as sandbagged silt fences, will be applied throughout construction of the project and will be removed after the working area is stabilized or as directed by the engineer. Soil exposure will be minimized through use of temporary BMPs, groundcover, and stabilization measures. Exposed dust-producing surfaces will be sprinkled daily, if necessary,

until wet; this measure will be controlled to avoid producing runoff. Paved streets will be swept daily following construction activities.

- The contractor will conduct periodic maintenance of erosion and sediment control measures.
- An appropriate seed mix of native species will be planted on disturbed areas upon completion of construction.
- Cover or apply nontoxic soil stabilizers to inactive construction areas (previously graded areas inactive for 10 days or more) that could contribute sediment to waterways.
- Enclose and cover exposed stockpiles of dirt or other loose, granular construction materials that could contribute sediment to waterways. Material stockpiles will be located in non-traffic areas only. Side slopes will not be steeper than 2:1. All stockpile areas will be surrounded by a filter fabric fence and interceptor dike.
- Contain soil and filter runoff from disturbed areas by berms, vegetated filters, silt fencing, straw wattle, plastic sheeting, catch basins, or other means necessary to prevent the escape of sediment from the disturbed area.
- Use other temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary re-vegetation or other ground cover) to control erosion from disturbed areas as necessary.
- Avoid earth or organic material from being deposited or placed where it may be directly carried into the channel.
- Ensure all areas that are disturbed/compacted during construction are stabilized, vegetated, and de-compacted as necessary, so that runoff rates from landscaped and pervious areas do not exceed those from pre-disturbed/natural conditions.

Implementation of the above BMPs would ensure that water quality impacts to the Harkins Slough and its tributaries are less than significant.

2.	*Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*	☐	☐	☒	☐

Discussion: The project would rely on a previously installed private well for water supply. The project is not located in a mapped groundwater recharge area or water supply watershed and will not substantially decrease groundwater supplies or interfere substantially with

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

groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

See Question J-5 for further discussion of sustainable groundwater management.

3.	*Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*	☐	☐	☒	☐
	A. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	B. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
	C. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;	☐	☐	☒	☐
	D. impede or redirect flood flows?	☐	☐	☒	☐

***Discussion*:** The project will not alter the course of any stream or river and does include the addition of impervious surfaces. A drainage plan was prepared for the proposed Project.

The County Department of Public Works Stormwater Management Section staff has reviewed the proposed drainage plan prepared for the project and determined it to be feasible, with required conditions to be implemented. The Project will not substantially alter the existing drainage pattern of the site in a manner that would result in erosion or siltation, or an increase in runoff from the site. The project is consistent with SCCC section 7.79.070, which states, "No person shall make any unpermitted alterations to drainage patterns or modifications to the storm drain system or any channel that is part of receiving waters of the county. No person shall deposit fill, debris, or other material in the storm drain system, a drainage channel, or on the banks of a drainage channel where it might enter the storm drain system or receiving waters and divert or impede flow." The Project will not substantially

alter the existing drainage pattern of the site in a manner that would result in erosion or siltation, or an increase in runoff from the site. Impacts would be less than significant.

Civil plans and Stormwater Management Report prepared by Roper Engineering dated February 2017 (Attachment 9) and Geotechnical Investigation-Design Phase by Rock Solid Engineering dated November 2014 (Attachment 5) and the addendum prepared to the geotechnical report dated January 5, 2017 (Attachment 10) were reviewed and accepted by the County Department of Public Works Stormwater Management Section staff. The project will be designed to direct runoff to bioretention/detention pond to be located on the eastern side of the project site, just west of the proposed berm that would be created at the edge of the riparian setback. The bioretention/detention pond would slow the runoff, maximizing the opportunity for infiltration. Clean overflow runoff will be allowed to drain through the berm into Harkins Slough which is directly adjacent. Staff has accepted the proposed stormwater management report. Impacts would be considered less than significant.

4.	*In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*	☐	☐	☒	☐

***Discussion*:**

Flood Hazards:

The proposed structures will be located on surveyed ground that is above the base flood elevation of 17 feet (NAVD 88). This area was incorrectly mapped According to the Federal Emergency Management Agency (FEMA) National Flood Insurance Rate Map, dated May 16, 2012. However, the project will meet the minimum flood plain management standards of the National Flood Insurance Program and the minimum flood plain design criteria in County Code section 16.10.070(F)(3). Impacts would be less than significant.

Tsunami and Seiche Zones:

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

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

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

Seiches are recurrent waves oscillating back and forth in an enclosed or semi-enclosed body of water. They are typically caused by strong winds, storm fronts, or earthquakes.

The project site is located three miles inland, approximately two and one-half miles beyond the effects of a tsunami. The project site is located approximately one-third mile from where Harkins Slough is open water and would not be affected by a seiche. Therefore, there would be no impact.

5.	*Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*	☐	☐	☒	☐

***Discussion*:** County water agencies are experiencing a lack of sustainable water supply due to groundwater overdraft and diminished availability of streamflow. Because of this, coordinated water resource management has been of primary concern to the County and to the various water agencies. As required by state law, each of the County's water agencies serving more than 3,000 connections must update their Urban Water Management Plans (UWMPs) every five years, with the most recent updates completed in 2016.

County staff are working with the water agencies on various integrated regional water management programs to provide for sustainable water supply and protection of the environment. Effective water conservation programs have reduced overall water demand in the past 15 years, despite continuing growth. In August 2014, the Board of Supervisors and other agencies adopted the Santa Cruz Integrated Regional Water Management (IRWM) Plan Update 2014, which identifies various strategies and projects to address the current water resource challenges of the region. Other efforts underway or under consideration are stormwater management, groundwater recharge enhancement, increased wastewater reuse, and transfer of water among agencies to provide for more efficient and reliable use.

The County is also working closely with water agencies to implement the Sustainable Groundwater Management Act (SGMA) of 2014. By January 2020, Groundwater Sustainability Plans will be developed for two basins in Santa Cruz County that are designated as critically overdrafted, Santa Cruz Mid-County and Corralitos - Pajaro Valley. These plans will require management actions by all users of each basin to reduce pumping, develop supplemental supplies, and take management actions to achieve groundwater sustainability by 2040. A management plan for the Santa Margarita Basin will be completed by 2022, with sustainability to be achieved by 2042.

The project is located in the Pajaro Valley Water Basin. The Pajaro Valley Water Management Agency (PVWMA) completed its Basin Management Plan update in 2014 and is bringing its plan into full compliance with SGMA.

Since the sustainable groundwater management plan is still being developed, the project will comply with SCCC Chapters 13.13 (Water Conservation – Water Efficient Landscaping), 7.69 (Water Conservation) and 7.70 (Water Wells), as well as Chapter 7.71 (Water Systems) section 7.71.130 (Water use measurement and reporting), to ensure that it will not conflict with or obstruct implementation of current water quality control plans or sustainable groundwater management plans.

K. LAND USE AND PLANNING

Would the project:

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

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

2.	*Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*	☐	☐	☒	☐

Discussion: The project would not cause a significant environmental impact due to a conflict with any land use plan, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. General Plan policy 5.2.3 (Activities Within Riparian Corridors and Wetlands) states: "Development activities, land alterations and vegetation disturbance within riparian corridors and wetlands and required buffers shall be prohibited unless an exception is granted per the Riparian Corridor and Wetlands Protection ordinance". In this case, the only activity proposed is restoration of the wetland. Restoration is specifically exempted from requiring a riparian exception by Santa Cruz County Code 16.30.050(D). Please see complete discussion under Question D-5.

In addition, the project complies with the purpose of the Watsonville Utility Prohibition or W Combining District which is to prevent the provision of urban services to undeveloped/rural areas west of the City of Watsonville, so as to discourage urban development in the farmlands, wetlands and other environmentally sensitive areas in the Coastal Zone west of Watsonville. No urban services are proposed to be extended as a part of

this application. The site will be served by an on-site septic system and well. Impacts would be considered less than significant.

L. 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 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 Agriculture (A), 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.

M. NOISE

Would the project result in:

1.	*Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*	☐	☐	☒	☐

County of Santa Cruz General Plan

The County of Santa Cruz has not adopted noise thresholds for construction noise. The following applicable noise related policy is found in the Public Safety and Noise Element of the Santa Cruz County General Plan (Santa Cruz County 1994).

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

The General Plan also contains the following table, which specifies the maximum allowable noise exposure for stationary noise sources (operational or permanent noise sources) (Table 2).

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

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

Notes:
1 As determined at the property line of the receiving land use. When determining the effectiveness of noise mitigation measures, the standards may be applied to the receptor side of noise barriers or other property line noise mitigation measures.
2 Applies only where the receiving land use operates or is occupied during nighttime hours
3 Sound level measurements shall be made with "slow" meter response.
4 Sound level measurements shall be made with "fast" meter response
5 Allowable levels shall be raised to the ambient noise levels where the ambient levels exceed the allowable levels. Allowable levels shall be reduced to 5 dB if the ambient hourly Leq is at least 10 dB lower than the allowable level.
Source: County of Santa Cruz 1994

County of Santa Cruz Code

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

(A) No person shall make, cause, suffer, or permit to be made any offensive noise.

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

(C) The following factors shall be considered when determining whether a violation of the provisions of this section exists:

(1) Loudness (Intensity) of the Sound.

(a) Day and Evening Hours. For purposes of this factor, a noise shall be automatically considered offensive if it occurs between the hours of 8:00 a.m. and 10:00 p.m. and it is:

(i) Clearly discernible at a distance of 150 feet from the property line of the property from which it is broadcast; or

(ii) In excess of 75 decibels at the edge of the property line of the property from which the sound is broadcast, as registered on a sound measuring

instrument meeting the American National Standard Institute's Standard S1.4-1971 (or more recent revision thereof) for Type 1 or Type 2 sound level meters, or an instrument which provides equivalent data.

A noise not reaching this intensity of volume may still be found to be offensive depending on consideration of the other factors outlined below.

(b) Night Hours. For purposes of this factor, a noise shall be automatically considered offensive if it occurs between the hours of 10:00 p.m. and 8:00 a.m. and it is:

(i) Clearly discernible at a distance of 100 feet from the property line of the property from which it is broadcast; or

(ii) In excess of 60 decibels at the edge of the property line of the property from which the sound is broadcast, as registered on a sound measuring instrument meeting the American National Standard Institute's Standard S1.4-1971 (or more recent revision thereof) for Type 1 or Type 2 sound level meters, or an instrument which provides equivalent data.

A noise not reaching this intensity of volume may still be found to be offensive depending on consideration of the other factors outlined below.

(2) Pitch (frequency) of the sound, e.g., very low bass or high screech;

(3) Duration of the sound;

(4) Time of day or night;

(5) Necessity of the noise, e.g., garbage collecting, street repair, permitted construction activities;

(6) The level of customary background noise, e.g., residential neighborhood, commercial zoning district, etc.; and

(7) The proximity to any building regularly used for sleeping purposes. [Ord. 5205 § 1, 2015; Ord. 4001 § 1, 1989]

Sensitive Receptors

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

The nearest sensitive receptor land use is a neighboring dwelling. It is located directly adjacent to one of the subject parcels' northwestern property line (APN 052-511-06) but would be about 500 feet away from the site of the lumbermill. Watsonville Community Hospital is located approximately one-half mile to the east of the project area.

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

Equipment	L_{max} (dBA)
Air Compressor	80
Backhoe	80
Chain Saw	85
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Saw	90
Crane	83
Dozer	85
Dump Truck	84
Excavator	85
Flat Bed Truck	84
Fork Lift	75
Generator	82
Grader	85
Hoe-ram	90
Jack Hammer	88
Loader	80
Paver	85
Pick-up Truck	55
Pneumatic Tool	85
Roller	85
Tree Chipper	87
Truck	84

Source: Federal Transit Authority, 2006, 2018.

Impacts

Potential Temporary Construction Noise Impacts

The use of construction equipment to accomplish the project would result in noise in the project area, i.e., construction zone. Table 3 shows typical noise levels for common construction equipment. The sources of noise that are normally measured at 50 feet, are used to determine the noise levels at nearby sensitive receptors by attenuating 6 dB for each doubling of distance for point sources of noise such as operating construction equipment. Noise levels at the nearest sensitive receptors for each site were analyzed on a worst-case basis, using the equipment with the highest noise level expected to be used.

Although construction activities would likely occur during daytime hours, noise may be audible to nearby residents. However, periods of noise exposure would be temporary. Noise from construction activity may vary substantially on a day-to-day basis.

Construction activity would be expected to use equipment listed in Table 3. Based on the activities proposed for the project, the equipment with the loudest operating noise level that would be used often during activity would be an excavator, which would produce noise levels of 85 dBA at a distance of 50 feet. The nearest sensitive receptor is located approximately 500 feet from the construction site. At that distance, the decibel level is reduced by approximately 20 decibels to 65 decibels. However, these impacts would also be temporary.

Noise generated during project construction would increase the ambient noise levels in adjacent areas. Construction would be temporary, and construction hours would be limited as a condition of approval. Given the limited duration of construction and the limited hours of construction activity, this impact is considered to be less than significant.

Potential Permanent Impacts: The proposed lumbermill includes multiple permanent noise sources. The lumbermill would include the following equipment: an electric mill, Weinig U17A molder, Whitney planer, Diehl Straightline rip saw and a Hyster forklift (Attachment 11).

The equipment was evaluated in an acoustical study prepared by Jim Barath, PhD, INCE of Sonics in a report dated July 27, 2021. Mr. Barath identifies the relatively loud ambient noise environment (58.3 dBA) which is a result of the site's proximity to Ranport Road, Highway 1, and the Watsonville Airport. To evaluate noise impacts, measurements are provided for noise at 3.5 meters from the equipment (see table on page 4 of Attachment 12). Mr. Barath extrapolates from the proposed location of the equipment relative to the property line, that in a "free field" environment (meaning the noise measurement is 3.5 meters from any reflecting surfaces) the equipment noise will comply with the General Plan noise standards which limit impulsive noises (such as those generated by the lumbermill equipment) to 65 dBa (Figure 6-2 of the General Plan) at the property line of the receiving use. Noise degrades quickly over distance and the property line of the nearest sensitive receptor is about 500 feet from the mill building.

Mr. Barath notes that, because of the physics of sound waves, it is possible that when the lumbermill equipment is moved inside the mill building that the building openings may concentrate noise, possibly causing the General Plan limit to be exceeded. Mr. Barath recommends that field measurements be taken upon completion and commencement of use of the mill building and, if needed, the noise shall be attenuated using a Mass Loaded Vinyl (MLV) noise barrier membrane to be added to the perimeter fencing at the property line adjacent to the proposed equipment. A condition of approval would be included in the permit authorizing the lumbermill which requires noise measurements following the construction and commencement of use of the mill building. If the measurements indicate that the General Plan standard is exceeded, then the MLV noise barrier will become required to be installed. In this way, compliance with County noise limits will be ensured, and impacts will be less than significant.

2. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

***Discussion*:** The use of construction and grading equipment would potentially generate periodic vibration in the project area. This impact would be temporary and periodic and is not expected to cause damage; therefore, impacts are not expected to be significant.

3.	*For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*	☐	☐	☒	☐

***Discussion*:** The project is located about 750 feet of the southeastern end of the Watsonville Municipal Airport with Highway 1 located between the airport and the project site. According to the General Plan Figure 9-4, "Future Watsonville Municipal Airport Noise Contours for the Year 2020," the proposed lumbermill would be located within the 55dB CNEL aircraft noise contour. This exposure level complies with General Plan Figure 9-2 "Acceptable through Unacceptable Ranges of Noise Exposure by Land Use," which categorizes noise up to 70dB DNL or CNEL for industrial and manufacturing land uses as "normally acceptable." Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant using standard construction practices.

N. POPULATION AND HOUSING

Would the project:

1.	*Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*	☐	☐	☐	☒

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

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
2. *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*	☐	☐	☐	☒

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

O. PUBLIC SERVICES

Would the project:

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

***Discussion (a through e)*:** While the project represents an incremental contribution to the need for fire and police services, the increase would be minimal. Moreover, the project meets all of the standards and requirements identified by the local fire agency or California Department of Forestry, as applicable, and school, park, and transportation fees to be paid by the applicant would be used to offset the incremental increase in demand for school and recreational facilities and public roads. Impacts would be considered less than significant.

P. 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*:** The project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities. Impacts would be considered less than significant.

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 project does not propose the expansion or require the construction of additional recreational facilities. No impact would occur.

Q. TRANSPORTATION

Would the project:

1.	*Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*	☐	☐	☒	☐

***Discussion*:** Senate Bill (SB) 743, signed by Governor Jerry Brown in 2013, changed the way transportation impacts are identified under CEQA. Specifically, the legislation directed the State of California's Office of Planning and Research (OPR) to look at different metrics for identifying transportation impacts. OPR issued its "Technical Advisory on Evaluating Transportation Impacts in CEQA" (December 2018) to assist practitioners in implementing the CEQA Guidelines revisions to use vehicle miles traveled (VMT) as the preferred metric for assessing passenger vehicle related impacts. The CEQA Guidelines were also updated in December 2018, such that vehicle level of service (LOS) will no longer be used as a determinant of significant environmental impacts, and an analysis of Vehicle Miles Traveled (VMT) from passenger vehicles will be required as of July 2020. A discussion of consistency with the Santa Cruz County General Plan LOS policy is provide below for informational purposes only.

The project would create a small incremental increase in traffic on nearby roads and intersections. The Department of Public Works typically does not require traffic information for projects generating fewer than 20 peak trips per day. This project does not meet that criterion.

Initially, the business owner anticipates two employees along with one lumber delivery per week and one outgoing milled wood delivery per week. Including the business owner, this equals three morning and evening passenger trips per day in addition to the two weekly

deliveries totaling four trips (one incoming delivery of logs and its return trip, one outgoing delivery of milled wood and its return trip for a total of four trips). As the business grows, the business owner anticipates the number of employees may grow to a maximum of 13 with one delivery per day. Outgoing deliveries would occur once or twice per week and potentially grow to once or twice per day. Given this, at its peak, the business would generate 14 morning and evening passenger trips (13 employees plus the business owner) and up to three deliveries per day (a total of six trips) for a total of up to 20 peak trips per day, depending on whether deliveries are made during peak times or not. The increase from project generated trips would not cause the LOS at any nearby intersection to drop below LOS D, consistent with General Plan Policy 3.12.1.

Lumber deliveries typically occur in a box truck that is less than 22 feet in length, with 40-foot-long log trailers being rarely used. Outgoing deliveries will be made on flatbed trucks or trailers of approximately 20 feet in length. Because the project site is less than 2,000 feet from the exit/entrance of Highway 1, these deliveries will have little impact on roads in the project vicinity.

The project design would comply with current road requirements, including the regulations under section 13.11.074 of the County Code, "Access, circulation and parking" to prevent potential hazards to motorists, bicyclists, and/or pedestrians, as well as the County of Santa Cruz Department of Public Works design criteria. Therefore, impacts would be less than significant.

2.	*Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1) (Vehicle Miles Traveled)?*	☐	☐	☒	☐

Discussion: In response to the passage of Senate Bill 743 in 2013 and other climate change strategies, OPR amended the CEQA Guidelines to replace LOS with VMT as the measurement for transportation impacts. The "Technical Advisory on Evaluating Transportation Impacts in CEQA," prepared by OPR (2018) provides recommended thresholds and methodologies for assessing impacts of new developments on VMT. There are also a number of screening criteria recommended by OPR that can be used to determine whether a project will have a less-than-significant impact. The screening criteria include projects that generate less than 110 net new trips, map-based screening, projects within a ½ mile of high quality transit, affordable housing projects, and local serving retail. Since Santa Cruz County has a Regional Transportation Planning Authority and generally conducts transportation planning activities countywide, the county inclusive of the cities is considered a region.

In June of 2020, the County of Santa Cruz adopted a threshold of 15% below the existing countywide average per capita VMT levels for residential projects, 15% below the existing countywide average per employee VMT for office and other employee-based projects, no net increase in the countywide average VMT for retail projects, and no net increase in VMT for other projects. Based on the countywide travel demand model the current countywide average per capita VMT for residential uses is 10.2 miles. The current countywide per employee average VMT for the service sector (including office land uses) is 8.9 miles, for the agricultural sector is 15.4, for the industrial sector is 13.9, and for the public sector is 8.2. Therefore, the current VMT thresholds for land use projects are 8.7 miles per capita for residential projects. For employee-based land uses the current thresholds are: 7.6 miles per employee for office and services projects, 13.1 miles per employee for agricultural projects, 11.8 miles per employee for industrial projects, and 7 miles per employee for public sector land use projects. The threshold for retail projects and all other land uses is no net increase in VMT. For mixed-use projects, each land use is evaluated separately unless they are determined to be insignificant to the total VMT.

The project is located on a site that currently supports a tree service business which has operated in this location for many years. The proposed land use consists of a specialty lumbermill which will share the site with the tree service. Initially, the business owner anticipates two employees along with one lumber delivery per week. Including the business owner, this equals three morning and evening passenger trips per day for a total of 6 daily trips. As the business grows, the business owner anticipates the number of employees may grow to 13 with three deliveries per day (six total trips counting each leg of a roundtrip). Given this, at its peak, the business would generate 14 morning and evening passenger trips (13 employees plus the business owner) for a total of 34 total daily trips. The net new number of passenger trips at full project development is 20, which is less than 110, and therefore can be presumed to be less than significant.

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

***Discussion*:** The project consists of a specialty lumbermill with no changes proposed to the access road (Ranport Road) other than the addition of two "Slow Trucks" signs on Ranport Road, as requested by the Department of Public Works. Although slow moving trucks are already present on Ranport Road due to the existing tree service business and agriculture-related trucks, the signs are intended as an additional safety precaution to notify drivers of

the possibility of slow trucks in the vicinity. No increase in hazards would occur from project design or from incompatible uses. No impact would occur from project implementation.

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

***Discussion*:** The project's road access meets County standards and has been approved by the local fire agency or California Department of Forestry, as appropriate.

R. TRIBAL CULTURAL RESOURCES

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

***Discussion*:** The project proposes to establish a specialty lumbermill. Section 21080.3.1(b) of the California Public Resources Code (AB 52) requires a lead agency formally notify a California Native American tribe that is traditionally and culturally affiliated within the geographic area of the discretionary project when formally requested. As of this writing, no California Native American tribes traditionally and culturally affiliated with the Santa Cruz County region have formally requested a consultation with the County of Santa Cruz (as Lead Agency under CEQA) regarding Tribal Cultural Resources. However, no Tribal Cultural Resources are known to occur in or near the project area. Therefore, no impact to the significance of a Tribal Cultural Resource is anticipated from project implementation.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
S. UTILITIES AND SERVICE SYSTEMS Would the project:				
1. *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*	☐	☐	☒	☐

***Discussion*:**

Water

The project would rely on an existing individual well for water supply. Public water facilities would not have to be expanded. Impacts from project construction would be less than significant.

Wastewater

The project would be served by a private on-site sewage disposal system, which would be adequate to accommodate the relatively light demands of the project. County Environmental Health Division has confirmed that additional soil testing will be required to determine if the previously submitted design will meet current code standards. Enhanced Treatment may be required. If Enhanced Treatment is required, the property owner will be required to obtain approval for a County septic permit and enroll in the State's Waste Discharge Requirement General Order No. WQ 2014-0153. The project will not be issued a building permit until a County septic permit is issued and enrollment in the State program occurs. Impacts would be less than significant.

Stormwater

The drainage analysis for the project, "Stormwater Management Report for Pacific Coast Hardwoods", prepared by Jeff A. Roper of Roper Engineering, dated February 2017 concluded that the bioretention/detention pond will adequately slow runoff and allow infiltration (Attachment 9). Runoff from the property drains directly to Harkins Slough without entering any drainage facility. Therefore, no additional drainage facilities would be required for the project. No impacts are expected to occur from the project.

Electric Power

Pacific Gas and Electric Company (PG&E)_provides power to existing and new developments in the Santa Cruz County area. As of 2018, residents and businesses in the County were automatically enrolled in MBCP's community choice energy program, which provides locally controlled, carbon-free electricity delivered on PGE's existing lines.

The proposed site is already served by electric power, but additional improvements are necessary to serve the site. However, no substantial environmental impacts will result from the additional improvements; impacts will be less than significant.

Natural Gas

The proposed site will be served by propane tanks, and no improvements related to natural gas service will be required. No impacts are anticipated.

Telecommunications

Telecommunications, including telephone, wireless telephone, internet, and cable, are provided by a variety of organizations. AT&T is the major telephone provider, and its subsidiary, DirectTV provides television and internet services. Cable television services in Santa Cruz County are provided by Charter Communications in Watsonville and Comcast in other areas of the county. Wireless services are also provided by AT&T, as well as other service providers, such as Verizon.

No improvements related to telecommunications are required, and there will be no impact.

2.	*Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*	☐	☐	☒	☐

***Discussion*:** All the main aquifers in this County, the primary sources of the County's potable water, are in some degree of overdraft. Overdraft is manifested in several ways including 1) declining groundwater levels, 2) degradation of water quality, 3) diminished stream base flow, and/or 4) seawater intrusion. Surface water supplies, which are the primary source of supply for the northern third of the County, are inadequate during drought periods and will be further diminished as a result of the need to increase stream baseflows to restore habitat for endangered salmonid populations. In addition to overdraft, the use of water resources is further constrained by various water quality issues.

The on-site well provides adequate water to serve the project. Environmental Health Services approved the previous installation of the well. The development would also be subject to the water conservation requirements in Chapter 7.69 (Water Conservation) and 13.13 (Water Conservation—Water Efficient Landscaping) of the County Code and the policies of section 7.18c (Water Conservation) of the General Plan. Therefore, existing water supplies would be sufficient to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

3.	*Result in determination by the wastewater treatment provider which serves or may*	☐	☐	☐	☒

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

serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

***Discussion*:** No wastewater would be connected to a municipal sewer collection system as the project site would be served by an on-site septic system. Therefore, no impacts would to occur from project implementation.

4. *Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*	☐	☐	☒	☐

***Discussion*:** Grading associated with preparing the site for construction is required to comply with the *Revised Subsurface Media Management Plan* (Attachment 8) prepared for the project site. The management plan details the management of potentially contaminated soil by requiring sampling to ensure compliance with reuse and/or disposal options. Soils with PCB waste will be transported off-site within one year in secured, marked and labeled in accordance with US Department of Transportation shipping regulations. PCB waste is required to be disposed in accordance with 40 Code of Federal Regulations Party 761.62 (Attachment 8, pages 7-8). The landfill destination for soil removed from the subject property will depend upon the concentration of PCB identified in the lab testing; different landfills accept different levels of PCB concentration. Other than off-cuts and chips resulting from the milling process, the project would result in a small incremental increase in solid waste generation during construction and operations. Off-cuts and chips will be used for off-site landscaping, and if the demand for these is low, then an air burner will be brought to the site periodically to incinerate the waste. Given this, the impact would not be significant.

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

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

T. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

1. *Substantially impair an adopted emergency response plan or emergency evacuation plan?*	☐	☐	☐	☒

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

Discussion: The project is not located in a State Responsibility Area, a Very High Fire Hazard Severity Zone, or a County-mapped Critical Fire Hazard Area and will not conflict with emergency response or evacuation plans. Therefore, no impact would occur.

2. *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?* ☐ ☐ ☒ ☐

***Discussion*:** The project is not located in a State Responsibility Areas, a Very High Fire Hazard Severity Zone, or a County-mapped Critical Fire Hazard Area. However, the project design incorporates all applicable fire safety code requirements and includes fire protection devices as required by the local fire agency and is unlikely to exacerbate wildfire risks. Impacts would be less than significant.

3. *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?* ☐ ☐ ☒ ☐

Discussion: The project is not located in a State Responsibility Areas, a Very High Fire Hazard Severity Zone, or a County-mapped Critical Fire Hazard Area. Improvements associated with the project are unlikely to exacerbate wildfire risks. Impacts would be less than significant.

4. *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?* ☐ ☐ ☒ ☐

***Discussion*:** The project is not located within a State Responsibility Areas, a Very High Fire Hazard Severity Zone, or a County-mapped Critical Fire Hazard Area. Downslope and downstream impacts associated with wildfires are unlikely to result from the project. Regardless, the project design incorporates all applicable fire safety code requirements and includes fire protection devices as required by the local fire agency. Impacts would be less than significant.

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

U. MANDATORY FINDINGS OF SIGNIFICANCE

1. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal community or eliminate important examples of the major periods of California history or prehistory?*	☐	☐	☒	☐

Discussion: The potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in Section III (A through T) of this Initial Study. Resources that have been evaluated as significant would be potentially impacted by the project, particularly migratory birds, the red-legged frog and pond turtle, as well as light impacts to the riparian woodland in general. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes ensuring that no nesting birds are present before tree work begins, conducting surveys for red-legged frogs and pond turtles no more than 48 hours prior to the commencement of ground disturbance, providing worker educational sessions just prior to commencement of ground disturbance, and controlling the type, location, and timing of lighting. 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.

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 project's potential for incremental effects that are cumulatively considerable. As a result of this

evaluation, impacts would not be considered cumulatively considerable. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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 (A through T). As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the presence of contaminated soils on-site. As a part of the redevelopment of this site, the contaminated soils could be brought to the surface and expose construction and commercial workers. However, mitigations have been included that clearly reduces these effects to a level below significance (Mitigation Measure Haz-1 and Haz-2). As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

IV. REFERENCES USED IN THE COMPLETION OF THIS INITIAL STUDY

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Attachment 1

Mitigation Monitoring and Reporting Program

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