



County of Santa Cruz

DEPARTMENT OF COMMUNITY DEVELOPMENT AND INFRASTRUCTURE

701 OCEAN STREET, FOURTH FLOOR, SANTA CRUZ, CA 95060-4070
Planning (831) 454-2580 Public Works (831) 454-2160

CEQA ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE SUSTAINABILITY POLICY AND REGULATORY UPDATE

Project Name: County of Santa Cruz 2026 Annual Code Update

Project Location: Countywide

Assessor Parcel No (APN): Countywide and APNs 026-091-54, 026-261-17, 029-071-13, 030-121-34, 042-151-23, 052-271-04, 070-301-01, and 074-152-30.

Project Description: The proposed 2026 Annual Code Update (Project) includes amendments to the General Plan/ Local Coastal Program (LCP) Chapters 2 and 5 and amendments to the Santa Cruz County Code (SCCC) Chapters 7.38, 9.36, 3.10, 13.11, 13.16, 13.20, 16.10, 16.10A, 16.20, 16.20A, 16.42, and 18.10, as part of an ongoing effort to update and streamline the County's regulatory framework, ensuring consistency with current policies, legal requirements, and land use goals. The Project also includes a General Plan Land Use Map amendment on APN 029-071-13, as well as Zoning Map amendments on parcels APN 026-091-54, 026-261-17, 029-071-13, 030-121-34, 042-151-23, 052-271-04, 070-301-01, and 074-152-30. The proposed amendments to the General Plan/LCP and to all the SCCC chapters except Chapter 16.42 are also amendments to the County's LCP and will require Coastal Commission certification after County adoption. Amendments to SCCC Chapter 7.38 require approval of the Central Coast Regional Water Quality Control Board.

County Contact: Jacob Lutz, Planner

Telephone No. (831) 454-3136

Date Completed: April 13, 2026

Background:

This document is an addendum to the Final Environmental Impact Report ("EIR") for the Sustainability Policy and Regulatory Update ("Sustainability Update") (State Clearinghouse No. 2020079005), which was certified by the Board of Supervisors on November 15, 2022. The certified Sustainability Update EIR includes the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). The Sustainability Update consisted of amendments to the County's General Plan/LCP, amendments to sections of the SCCC, adoption of County Design Guidelines, and General Plan land use map and/or zoning map amendments for 23 properties. In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes the proposed General Plan/LCP, SCCC, General Plan land use map, and Zoning Map amendments to determine whether potential environmental impacts associated with the proposed amendments would be within the scope of analyses evaluated in the Sustainability Update EIR.

CEQA Authority

Once an EIR has been certified (or a Negative/Mitigated Negative Declaration has been adopted) for a project, Sections 15162-15164 of the State CEQA Guidelines define the standards for determining the appropriate level of subsequent environmental review, and Section 15164 addresses the specific circumstances requiring the preparation of an addendum to an EIR. Specifically, Section 15164(a) of the CEQA Guidelines states that:

SUSTAINABILITY POLICY AND REGULATORY UPDATE EIR ADDENDUM

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

When it can be determined that the proposed changes to an approved project, changed circumstances, or new information would not result in the identification of new significant impacts or a substantial increase in the severity of significant impacts identified in the certified EIR, an addendum to the EIR may be prepared. If significant new impacts or a substantial increase in the severity of previously identified impacts would result, then preparation and circulation of a subsequent or supplemental EIR for additional public review is required. Public review of an addendum is not required under CEQA.

Section 15162 of the CEQA Guidelines does not require a subsequent EIR be prepared for a project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

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

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;*
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report;*
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.*

Overview of the Certified Sustainability Update Final EIR

The certified Sustainability Update Final EIR analyzed amendments to the County's General Plan/LCP and chapters/sections of the SCCC, as well as two other components described below. The Sustainability Update was a comprehensive update to the County's General Plan/LCP and modernization of the SCCC. The goal of this update was to implement new policies and code

regulations that support more sustainable communities in Santa Cruz County. The County's previous LCP was adopted in 1994, and was updated to align with new state laws, new regional and local plans, and a community vision that is focused on sustainable growth. The SCCC needed to be updated to implement the changes that are proposed in the General Plan/LCP. The County modernized the SCCC and prepared County Design Guidelines that were intended to help applicants understand the County's development rules and design projects that align with the community's vision. The proposed project also arises in part from the Sustainable Santa Cruz County Plan, accepted by the Board of Supervisors in October 2014 as a planning and feasibility study that focused on sustainable development of the County's urban areas. The Sustainability Update consisted of four key components described below:

1. *General Plan/LCP Amendments.* The approved amendments, text revisions, new or revised goals, objectives and policies, and new and revised implementation strategies that replaced prior programs. Revisions were included for the following five General Plan/LCP chapters:
 - Chapter 1: Introduction;
 - Chapter 2: Built Environment (formerly Land Use);
 - Chapter 3: Access + Mobility (formerly Circulation);
 - Chapter 5: Agriculture, Natural Resources + Conservation; and
 - Chapter 7: Parks, Recreation + Public Facilities.The above-listed General Plan/LCP elements joined three other existing elements that were previously updated, which comprise the entirety of the General Plan/LCP:
 - Chapter 4: Housing (2016);
 - Chapter 6: Public Safety (2020); and
 - Chapter 8: Noise (2019).
2. *SCCC Amendments.* Amendments to the SCCC were included in Title 13—Planning and Zoning Regulations and Title 18—Procedures, with some revisions to Title 5—Business Regulations, Title 12—Building Regulations, Title 15—Community Facilities, and Title 16—Environmental and Resource Protection, in order to ensure regulations incorporated State law and modern practices, reflected General Plan/LCP proposed revisions, and are internally consistent.
3. *County Design Guidelines.* The Sustainability Update includes adoption of County Design Guidelines, which are referenced in revisions to SCCC Chapter 13.11.
4. *Land Use and Zoning Map Amendments.* Selected property-specific General Plan land use designation changes and/or rezonings have been identified by County staff and include identified opportunity sites such as the vacant property located at Soquel Drive and Thurber Lane and vacant and underutilized properties along the Portola Drive commercial corridor. There were General Plan designation and/or zone district amendments for other parcels in order to achieve consistency with the General Plan and/or existing uses on a property.

The California Coastal Act of 1976 (Coastal Act) requires local jurisdictions to adopt an LCP to regulate development within the coastal zone. An LCP consists of both a Land Use Plan (LUP) and a Local Coastal Implementation Plan (LCIP) with implementing actions that are consistent with the statewide Coastal Act policies. The Coastal Act requires California Coastal Commission approval of amendments to jurisdictions' LUP and LCIP. The approved Sustainability Update included amendments to some General Plan/LCP goals, objectives, policies, and implementation strategies that are also part of the LUP. The approved Sustainability Update included amendments to some sections of the SCCC that included sections that are part of the LCIP. These sections and chapters required Coastal Commission approval as part of an LCP amendment; the Coastal Commission certified the Sustainability Update elements that are part of the County's LCP on December 15, 2023.

Proposed Project Modifications

The 2026 Annual Code Update proposes a series of amendments to the General Plan/ LCP and various SCCC chapters, as part of an ongoing effort to update and refine the County's regulatory framework to improve permitting processes, address evolving legal changes, ensure consistency with current policies, and improve regulatory clarity and functionality. The proposed amendments also include an amendment to the General Plan land use map for one parcel and amendment to the zone district for eight parcels, including the parcel with the proposed General Plan land use designation amendment. Proposed amendments are summarized below. Text revisions and details of the proposed amendments are documented in the County's Community Development and Infrastructure Department staff report to the Planning Commission (hereinafter referred to as "the staff report").

General Plan/LCP Amendments. Minor amendments to the County's General Plan/LCP are proposed in Chapter 2: Built Environment Element and Chapter 5: Agriculture, Natural Resources + Conservation Element related to coastal special communities and coastal scenic areas. The amendments include minor text revisions to resolve General Plan and SCCC inconsistencies with the designation of coastal special communities and provide clarification of the specific areas designated coastal special communities.

Santa Cruz County Code Amendments. Amendments are proposed to SCCC Chapters 7.38, 9.36, 13.10, 13.11, 13.16, 16.10, 16.10A, 16.20, 16.20A, 16.42, and 18.10, including various sections within each of these chapters. The proposed amendments are primarily intended to streamline permitting processes, ensure compliance with state laws, and improve clarity and accuracy, as well as correct inconsistencies, including outdated references and unclear language.

Proposed amendments intended to streamline permitting include minor revisions to some definitions and clarifications or revisions to requirements for: onsite wastewater treatment systems (OWTSs); use of parking for outdoor seating; review authority for replacement of structures after a disaster; residential site and development standards; processing grading permits; and preapplication consultations. Proposed amendments to ensure compliance with state and local laws generally address transit definitions; noticing requirements in the coastal zone; and public hearing notices. Amendments to provide clarification and ensure internal consistency between the General Plan/LCP and SCCC generally consist of minor text revisions that address coastal special communities; fences; home occupations; parking standards for single-family homes; vehicle parking design standards; overnight parking in the North Coast Beach parking areas; some residential development standards; and temporary storage structures. There are also minor text clarifications to SCCC chapters regarding geologic hazards and historical preservation.

Zoning Map Amendments. Eight parcels are proposed for rezoning throughout the unincorporated area as explained below.

- Two parcels (APN 070-301-01 and 074-152-30) are proposed for rezoning so that the zoning matches the General Plan land use designation. In the case of conflicts between the General Plan and zoning, the General Plan prevails. Another parcel (APN 029-071-13) is proposed to be rezoned from R-1-6 to RM-1.5-Min to be consistent with the proposed General Plan land use designation as described below.
- Removal of the "-L" historic building zoning overlay is proposed for three parcels (APN 026-091-54, 042-151-23, and 052-271-04) as the parcels no longer have historic buildings on them and are either currently proposed to be delisted or have been delisted from the County's Historic Resources Inventory.
- Three parcels (APN 026-261-17, 029-071-13, and 030-121-34) are proposed for rezoning by adding the "-Min" ministerial combining district zoning overlay to match adjacent and

consolidated sites that already have the “-Min” overlay to support affordable housing development, as dictated by the County’s Housing Element.

General Plan Land Use Designation Map Amendment. One parcel (APN 029-071-13) in the Live Oak planning area is proposed for a General Plan Land Use Map amendment. The amendment would change the existing designation of R-UL (Urban Low – Residential) to R-UH (Urban High – Residential) to be consistent with R-UH land use designation on the adjacent parcel (APN 029-071-03) and to facilitate an affordable housing development. As indicated above, this parcel also is proposed to be rezoned from R-1-6 to RM-1.5-Min to be consistent with the proposed General Plan land use designation and the adjacent parcel with the “-Min” overlay to support affordable housing development.

Analysis

General Plan/LCP Amendments. Text amendments to Chapters 2 and 5 are proposed so that SCCC and General Plan/LCP references to coastal special communities are internally consistent. Text revisions in Chapter 2 strengthen language for protection of Coastal Special Scenic Areas and Coastal Special Communities, as well as other special areas in the Coastal Zone identified in Policy ARC-5.1.11 in Chapter 5. The proposed revisions further reference applicable design criteria in the SCCC. Proposed text changes to Chapter 5 provide further clarity and definition of these coastal special areas to ensure the continued protection of coastal resources and adds description of the specific area within identified Coastal Special Communities. Overall, these proposed amendments are minor text revisions necessary to resolve General Plan and SCCC inconsistencies with the designation of coastal special communities and would ensure the continued protection of coastal resources. Therefore, these text changes would not directly or indirectly, as a result of future development, result in new significant environmental impacts or a substantial increase in the severity of significant impacts identified in the Sustainability Update EIR.

Santa Cruz County Code Amendments. As indicated above, the proposed SCCC amendments are primarily intended to streamline permitting processes, ensure compliance with state and federal law, and improve clarity and accuracy, as well as correct inconsistencies, including outdated references and unclear language.

- ***Streamlining Efforts.*** Proposed text revisions (Amendments #1-20 in the staff report) are intended to make the County Code easier to administer and understand, remove redundancies, and help facilitate more efficient reviews of development applications while still protecting and maintaining the necessary and applicable health, safety, environmental, and resource protection standards. The amendments include a coordinated definition of “in-kind” replacement in order to facilitate redevelopment of lost structures due to a disaster that will facilitate reviews by Planning, Environmental Planning, and Environmental Health.

Several of the streamlining amendments aim to clarify the application of SCCC Chapter 7.38 for properties with onsite wastewater treatment systems (OWTSs), and how these systems can continue to serve potential additions, remodels, replacement structures, or smaller accessory dwelling units (ADUs) without requiring full upgrades, provided that the systems are permitted, adequately sized, and functioning without failure.

Proposed revisions to SCCC Section 13.10.323 are intended to clarify and simplify the residential site and development standards in this section, particularly as they relate to minimum lot sizes and how development standards apply to land divisions. These amendments are to align residential standards with the General Plan densities adopted the Sustainability Update, which increased the allowable residential densities for several General Plan land use designations and to eliminate inconsistencies with the General Plan as amended by the Sustainability Update.

Additional streamlining efforts are focused on simplifying permit processing, including but are not limited to: clarifying permit authority across zoning, grading, design review, and coastal provisions; eliminating the need for large dwelling permits for structures greater than 5,000 square feet; updating grading permit thresholds and review procedures, lowering the level of approvals needed for certain applications; modifying the use of limited parking stalls for outdoor seating; and revising the procedural classifications of permits in SCCC 18.10 so that the code requirements better aligns with the County's permit structure of streamlining applications.

- *State Law Consistency.* Text revisions (Amendments #21-27 in the staff report) are proposed to ensure that the SCCC remains consistent with current State law by incorporating recent statutory changes and revising local provisions where necessary. The amendments are primarily technical in nature and do not establish new local policy but instead ensure that the County's regulations accurately reflect current State laws. The six amendments update the definitions of "major transit stop" and "transit priority area" pursuant to Public Resources Code Section 21155, revise noticing and hearing procedures for coastal development permit exemptions pursuant to Section 13569 of the California Coastal Commission's regulations, update Coastal Commission appeal provisions to reflect changes established by recently adopted Assembly Bill (AB) 130, and increase the public notice period for legislative matters affecting zoning from 10 days to 20 days prior to Planning Commission public hearings, pursuant to AB 2904.
- *Internal Consistency/Clarification.* Proposed text revisions (Amendments #28–49 in the staff report) improve internal consistency within the SCCC and General Plan. By resolving technical inconsistencies and updating regulatory language, these amendments would ensure a more predictable and accelerated pathway for applicants by correcting cross-references, updating and refining terminology, and clarifying existing development standards and procedures.

Proposed amendments to SCCC Chapters 16.10 and 16.10A (Geologic Hazards) consist of minor text revisions to provide clarification. Proposed amendments SCCC Chapter 16.42 (Historic Preservation) primarily consist of clarifications and technical corrections intended to improve readability and internal consistency without altering the underlying regulatory framework.

Additional amendments include minor updates to improve clarity in development standards, parking and design provisions, grading requirements, and technical report procedures. These revisions are administrative in nature and are intended to improve readability and usability of the SCCC and General Plan without changing the underlying policy intent or regulatory standards. Overall, these amendments help ensure that County regulations remain clear, internally consistent, and easier for applicants, staff, and the public to interpret and apply.

The proposed revisions to the above referenced SCCC sections would not result in new or intensified development or weaken existing regulations that serve to protect environmental resources or avoid environmental impacts. The proposed amendments are considered minor, and as explained above, are intended to streamline permitting processes, ensure consistency with state law, and provide internal consistency between the Zoning Ordinance and General Plan/LCP as set forth in goals, policies, and/or implementation strategies adopted as part of the Sustainability Update. The revisions would not directly or indirectly result in new significant impacts on the environment or a substantial increase in the severity of significant impacts identified and evaluated in the Sustainability Update EIR.

Zoning Map Amendments. Eight parcels across the county are proposed for rezoning. As indicated above, two parcels (APN 070-301-01 and 074-152-30) are proposed for rezoning to match the General Plan Land Use residential land use designation. In the case of conflicts with the General Plan and zoning, the General Plan prevails. These rezonings do not alter development potential on the site,

which is guided by the existing General Plan land use designation, but would correct the inconsistency of existing zoning with existing General Plan designations. Thus, the amendments would not result in new impacts. The proposed amendment to rezone APN 029-071-13 from R-1-6 to RM-1.5-Min is discussed below in the “General Plan Land Use Designation Map Amendment” analysis.

Removal of the “-L” historic building zoning overlay on three parcels (APN 026-091-54, 042-151-23, and 052-271-04) is proposed as the parcels either no longer have former historical structures or structures have been found to be deteriorated beyond repair, and have been delisted from the County’s Historic Resources Inventory. These rezonings will also streamline development application reviews by eliminating the requirement for a historic resources review since a building of historic significance no longer exists on these parcels. As listed historical resources are no longer present, this amendment would not lead to impacts to historical resources or other new significant impacts.

Three parcels (026-261-17, 026-261-17, and 030-121-34) are proposed for rezoning by adding the “-Min” ministerial combining district zoning overlay to match adjacent and consolidated sites that already have the “-Min” overlay, as dictated by the County’s Housing Element. The amendments are consistent with the County’s 2023 Housing Element that includes a key program to develop a by-right overlay zone to permit rental and owner-occupied multi-family housing uses by right (ministerially) for developments with 20% or more lower-income units pursuant to state law. These rezonings will create consistency during project review for other parcels that have already had rezones approved and would facilitate development of affordable housing consistent with the County’s Housing Element and goals and policies set forth in the Sustainability Update EIR. Therefore, these rezoning amendments would not result in new significant impacts.

In addition, the County prepared an addendum to the Sustainability Update EIR for adoption of the County of Santa Cruz 2023 Housing Element. The Housing Element provides quantified objectives for construction, rehabilitation, and conservation of housing units and includes goals, policies and programs that support housing units for all income groups and identifies available sites to meet the County’s Regional Housing Needs Allocation (RHNA) of 4,634 new housing units for the years 2023 through 2031. Three of the parcels proposed for rezoning (026-091-54, 026-261-17, and 030-121-34) are included in the Housing element Housing Sites Inventory, which provides a parcel-specific inventory of suitable and appropriately designated and zoned sites that could be developed with residential uses. Furthermore, the proposed “-Min” ministerial combining district zoning overlay for APN 029-071-13 would be consistent with the land use designation and zoning on adjacent parcel APN 029-071-03 (2021 Chanticleer Avenue). This latter parcel also was part of the Housing Element Sites Inventory and currently has a pending development application for a proposed 100% affordable housing project. Thus, the proposed zone district amendments for the these three parcels also are consistent with the Housing Element, and the Addendum to the Sustainability Update found that the 2023 Housing Element is consistent with and expands housing goals, policies, and programs in the General Plan/LCP as modified by the Sustainability Update and resulting development would be within the amount of residential development evaluated in the Sustainability Update EIR.

General Plan Land Use Designation Map Amendment. One parcel (APN 029-071-13) is proposed for a General Plan Land Use Map amendment. The amendment would change the existing designation of R-UL (Urban Low – Residential) to R-UH (Urban High – Residential) to be consistent with the R-UH land use designation on the adjacent parcel and to facilitate an affordable housing development that is proposed on the adjacent property. This parcel also is proposed to be rezoned from R-1-6 to RM-1.5-Min to be consistent with the new General Plan land use designation with the “-Min” overlay to be consistent with the zoning on the adjacent parcel as described above.

The parcel proposed for re-designation is located at 2030 17th Avenue in the Live Oak planning area within the County’s Urban Services Line (USL). The 0.24-acre property is currently developed with a

single-family home and is located within a predominantly developed residential neighborhood. The existing R-UL designation allows a density of 4-10 dwelling units per acre; the proposed R-UH designation allows 11-30 dwelling units per acre. The residential development potential on the site would increase from approximately 2 dwelling units under the existing General Plan land use designation to approximately 7 dwelling units with the proposed amendment. Thus, the proposed amendment would result in a net increase of the site's development potential by approximately 5 dwelling units and by approximately 6 dwelling units over the existing land use.

The site currently is part of a 100% affordable multifamily housing project proposed on the adjacent parcel at 2021 Chanticleer Avenue (APN 029-071-03). The original proposal on the adjacent site was for a 54-unit housing project, which would increase by 7 units to a 61-unit project with the inclusion of the Project site proposed for the General Plan land use amendment. This net increase in proposed residential units is consistent with the above estimate of the number of housing units that could potentially be developed with the proposed amendment.

The Sustainability Update EIR considered the impacts of new residential development, as well as repurposing, intensifying, and redeveloping existing developed parcels throughout the unincorporated county. The Sustainability Update included the new R-UHF land use designation and other policies that support intensified redevelopment, primarily focused along transportation corridors within the USL. The proposed site is located on 17th Avenue, which is identified as a multi-modal corridor in the Sustainability Update. Thus, the proposed land use map amendment is consistent with underlying goals and policies in the Sustainability Update as evaluated in the EIR related to intensified development along transportation corridors in the USL.

The Sustainability Update EIR estimated that the Update had the potential to accommodate approximately 4,500 housing units throughout the county over baseline conditions evaluated in the EIR with approximately 75% projected to occur within urban areas. This forecast provided an estimate of potential growth that could occur as a result of adoption and implementation of the Sustainability Update for the purpose of evaluation in the EIR, and the EIR noted that annual limits for residential units are set by the County pursuant to Measure J and SCCC provisions.

Since the base year of analysis (2021) for projections used in the Sustainability Update EIR, approximately 853 residential units have been constructed or approved throughout the unincorporated area. Thus, the change in the residential development potential from 2 to 7 units with the proposed amendment in addition to other residential units that have been constructed or approved would result in a net increase in approximately 860 residential units, which would be well within the remaining residential buildout estimates of 4,500 residential units considered and evaluated in the Sustainability Update EIR impact analyses. The Sustainability Update EIR also estimated 2,002 new residential units could be developed in the Live Oak planning area as a result of the Sustainability Update. Approximately 421 residential units have been permitted in the Live Oak planning area since the base year of analysis for the Sustainability Update EIR. Thus, the residential development potential resulting from the proposed amendment would be well within the remaining residential buildout estimates within the Live Oak planning area.

The Project parcel is not located in the coastal zone. The site is currently developed with a single-family house and does not contain, nor is it adjacent to, lands with agricultural or forest resources and is classified as Urban and Built-Up Land in the California Farmland Mapping and Monitoring Program. Thus, future development would not result in impacts to agricultural, forest, or coastal resources. Similarly, the parcel is not located in a flood zone or in proximity to an airport and would not result in impacts related to flood hazards or airport hazards or noise.

Maps included in the County's Geographic Information Services (GIS) did not identify the parcel as being located in a sensitive biological or archaeological resources area. Studies conducted at the site found no biological resources and no archaeological or historical resources considered significant under CEQA; therefore future development resulting from the proposed amendment would not result in potentially significant impacts to biological or cultural resources. Additionally, the Sustainability Update EIR found that with required compliance with existing federal, state, and local regulations, and implementation of General Plan/LCP policies and implementation strategies, potential impacts to nesting birds, due to future development resulting from implementation of the Sustainability Update, would be a less-than-significant impact.

The Project parcel also is proposed to be rezoned from R-1-6 to RM-1.5-Min to be consistent with the new General Plan land use designation, which could result in future development with a slightly increased building height of 35 feet from the existing 28 feet permitted under the existing General Plan designation. However, the Sustainability Update EIR found that while some future buildings may be taller, it also found that future development in urbanized areas would be required to comply with the County's design review procedures and requirements, including adherence to the new County Design Guidelines and Site Development Permit requirements, as well as General Plan policies. In particular, Policy BE-4.1.4 requires new residential infill development to consider scale and size of the existing surrounding neighborhood and requires appropriate building massing, setbacks, and landscape buffers where development projects introduce a change in neighborhood character in order to reduce the perception of bulk and height. Thus, the Sustainability Update EIR concluded that future development would not adversely impact scenic resources or conflict with policies and regulations governing scenic quality, resulting in a less-than-significant impact, and future development on the Project site resulting from the proposed amendment would be within the scope of this analysis.

As explained above, the increase in the development potential of the Project site would be minimal and well within residential development estimates considered and evaluated in the Sustainability Update EIR and remaining development potential analyzed in the EIR. Thus, potential impacts of future development indirectly resulting from the proposed amendment related to population increases, energy demand, greenhouse gas emissions, and noise would be within the residential development estimates evaluated in the Sustainability Update EIR. Additionally, the minor increase in development potential would be well below residential development levels considered by the Monterey Bay Air Resources District to potentially result in significant air quality impacts.

The Sustainability Update EIR concluded that with adherence to existing regulations and standards, including the CBC, the County's Building Regulations, and various policies and actions established in the Sustainability Update would minimize impacts related to seismic and geologic hazards, soils, erosion, stormwater and water quality impacts. Therefore, the EIR concluded that potential impacts as a result of future development resulting from implementation of the Sustainability Update would be less than significant. As future development on the Project site resulting from the proposed amendment would be required to comply with all relevant County and State policies and regulations, the Project would not result in new significant impacts related to geology, soils or hydrology as a result of the proposed amendment.

A study conducted on the Project site found no evidence of "recognized environmental conditions (RECs)" or hazardous materials on the site, and thus, future development would not result in impacts related to exposure to hazards. Although not a REC, the study did indicate that asbestos and/or lead-based paint may be present due to the age of the existing building. However, the Sustainability Update EIR found that all demolition activities would be required to be undertaken according to OSHA standards to protect workers from asbestos and lead based paint, and any demolition of buildings containing asbestos also would be required to comply with the Monterey Bay Air Resources District's Rule 306 that requires reporting and investigation of certain buildings with asbestos as established

under federal law. The EIR concluded that with adherence to federal, state, and local regulations, impacts related to exposure to hazardous materials would be less than significant, and potential future development on the Project site would be required to comply with these regulations and not result in new significant impacts.

As the increase in the development potential of the Project site would be minimal and well within residential development estimates considered and evaluated in the Sustainability Update EIR and remaining development potential analyzed in the EIR, demand for public services (fire and police protection, schools, and parks/recreation) and public utilities (water supply, wastewater collection and treatment, and solid waste disposal) would be within the development estimates evaluated in the Sustainability Update EIR. The Live Oak planning area is provided water service by the City of Santa Cruz. While the EIR identified a potentially significant impact regarding provision of water service, this was primarily due to uncertainty regarding potential future development within the part of the city of Capitola also served by the City of Santa Cruz. However, as indicted above, development within the Live Oak planning area, including development potentially resulting from the amendment, would be well within remaining development and estimated water demand evaluated in the EIR.

Similarly, transportation impacts resulting from future development, including vehicle miles traveled (VMT), would be within the development estimates evaluated in the Sustainability Update EIR. The EIR identifies potential significant impacts related to countywide VMT as a result of future development. However, the EIR also indicates that future development projects would be subject to review under the County's VMT Guidelines, which identify projects that would be automatically considered within significance thresholds due to size, housing affordability, proximity to high-quality transit, and other screening criteria. The EIR concluded that some types of future projects, such as small projects, projects near high-quality transit, local-serving retail projects, and affordable housing projects could be found to meet the County's VMT threshold and, and therefore, be found to result in less-than-significant impacts. The Project parcel with the proposed General Plan Land Use Map amendment currently is part of a proposed 100% affordable housing project, and an affordable housing project would screen a project from further VMT review with a conclusion that VMT impacts would be less than significant. Should a different project be proposed for the property, it is likely it would be similarly screened out due to being a small project, affordability and/or proximity to transit.

In conclusion, the proposed General Plan land use map amendment would not result in new significant impacts or substantially more severe significant impacts than were analyzed in the Sustainability Update EIR.

Determination

Based on the foregoing review of all Project components, the proposed Project is within the scope of the impacts evaluated in the Sustainability Update EIR. Neither, the proposed General Plan/LCP and SCCC amendments with minor text changes nor the proposed General Plan land use amendment and rezoning of eight parcels would result in new significant impacts or substantially more severe impacts than identified and evaluated in the certified Sustainability Policy and Regulatory Update EIR. All of the impacts associated with the proposed Project are within the scope of analyses in the Sustainability Update EIR. Similarly, there are no substantial changes with respect to the circumstances under which the Project is undertaken or new information of substantial importance that would result in new significant impacts or a substantial increase in severity of previously identified impacts since certification of the EIR, as explained in the following review. None of the conditions described in Section 15162 of the CEQA Guidelines have occurred that would require preparation of a Subsequent EIR. Additionally, five of the six mitigation measures included in the EIR and related to agricultural, biological, and historical resources and VMT impacts, are not applicable to any element the Project. One mitigation measure that requires preparation of a historical resources assessment for

SUSTAINABILITY POLICY AND REGULATORY UPDATE EIR ADDENDUM

developments with structures 50+ years in age has been completed for the property with the proposed General Plan Land Use Map amendment, and no historical resources were identified.

Therefore, pursuant to Section 15164 of the CEQA Guidelines, preparation of this Addendum to the certified Sustainability Policy and Regulatory Update EIR (State Clearinghouse No. 2020079005) is the appropriate environmental review document for the proposed County of Santa Cruz 2026 Annual Code Update.