County of Santa Cruz

DEPARTMENT OF COMMUNITY DEVELOPMENT AND INFRASTRUCTURE
701 OCEAN STREET, FOURTH FLOOR, SANTA CRUZ, CA 95060
PLANNING (831) 454-2580 PUBLIC WORKS (831) 454-2160
SCCOPLANNING.COM DPW.CO.SANTA-CRUZ.CA.US
MATT MACHADO - DEPUTY CAO / DIRECTOR

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

Date: October 16, 2024

Application Number: 231264

Project Name: Watsonville Slough Farm Community Harvest Project

Staff Planner: Randall Adams

I. OVERVIEW AND ENVIRONMENTAL DETERMINATION

APPLICANT: Land Trust of Santa Cruz County

APN(s): 052-081-34, -35, -37

OWNER: Same as Applicant

SUPERVISORIAL DISTRICT: 2nd

PROJECT LOCATION:

The proposed project is located at 275 Lee Road on the west side of Lee Road and Highway 1 within the southern portion of unincorporated southern Santa Cruz County; see Figure 1. 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. The project site is bounded by Lee Road on the east, Harkins Slough Road on the north and agricultural and rural lands on the west and south.

SUMMARY PROJECT DESCRIPTION:

The proposed project would result in structural and site improvements to support operation of the proposed Community Harvest Program at the Watsonville Slough Farm that is owned and managed by the Land Trust of Santa Cruz County (Land Trust). The Program calls for opening up areas on the Farm to local families and other visitors so they can harvest fruits and vegetables for their own consumption while learning about healthy food and sustainable agricultural practices. A reconstructed barn, new restrooms, picnic areas, parking improvements, trails and a number of other minor improvements are proposed to support the Program. In addition, the Project includes development of four agricultural worker residential units. See Figure 2 for the overall site plan.

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
- ☐ Energy
- ☐ Geology and Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards and Hazardous Materials
- ✓ Hydrology/Water Supply/Water Quality
- ☐ Land Use and Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population and Housing
- ☐ Public Services
- ☐ Recreation
- ✓ Transportation
- ☐ 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: Use Approval

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

Permit Type/Action	Agency
Section 404 Nationwide Permit	U.S. Army Corps of Engineers
Section 401 Water Quality Certification	California Regional Water Quality Control Board
1602 Streambed Alteration Agreement	California Department of Fish and Wildlife

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.

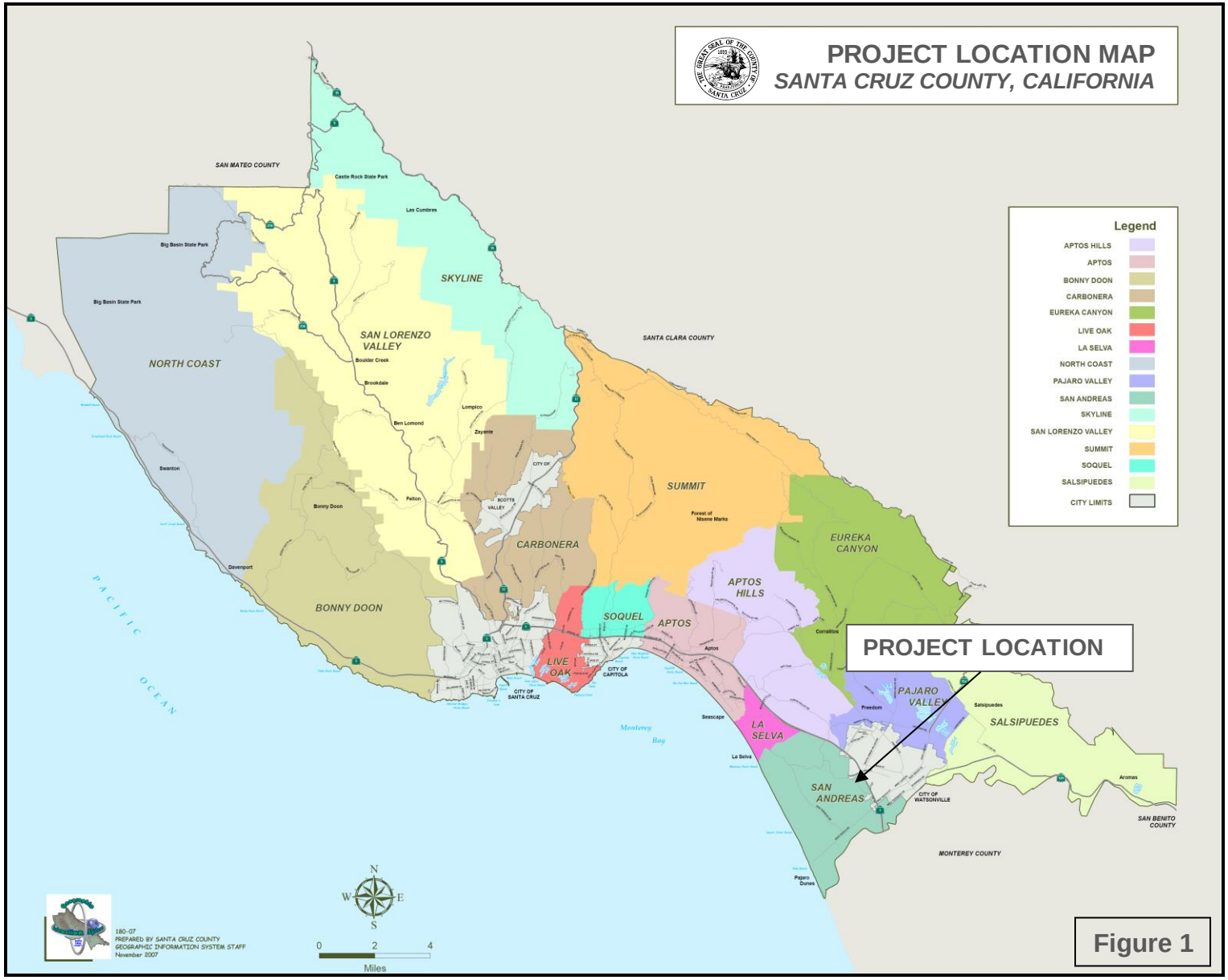
DocuSigned by:
Matt Johnston
B0A04200B3E8413...

MATT JOHNSTON, Environmental Coordinator

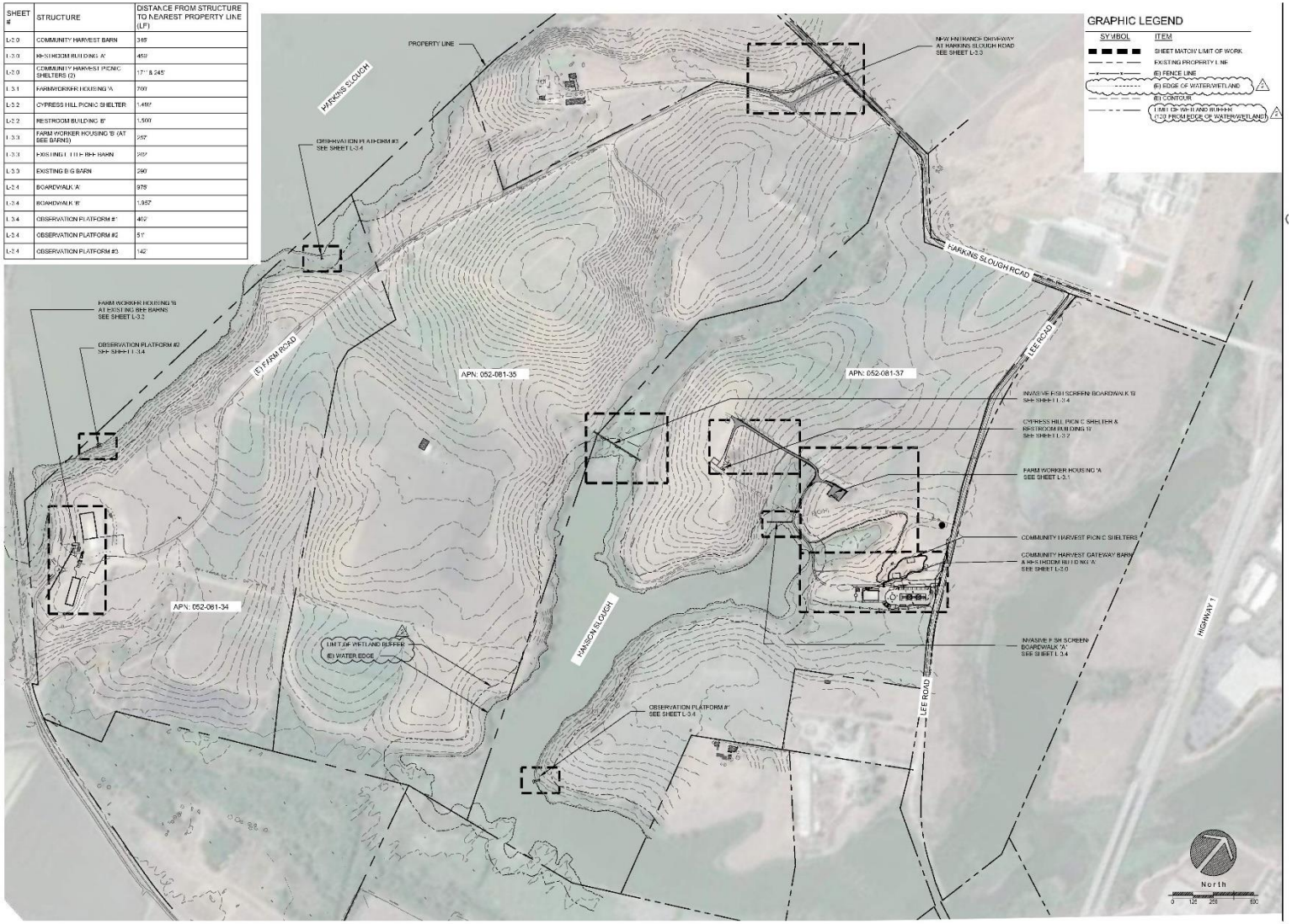
11/7/2024

Date

This page intentionally left blank.


PROJECT LOCATION MAP
SANTA CRUZ COUNTY, CALIFORNIA
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
LA SELVA
PAJARO VALLEY
SALSIPUEDES
SAN ANDREAS
BONNY DOON
PROJECT LOCATION
PACIFIC OCEAN
Monterey Bay
Castle Rock State Park
Las Cumbres
Big Basin State Park
Boulder Creek
Brookdale
Lompico
Ben Lomond
Zayante
Felton
Bonny Doon
Davenport
Swanton
Forest of Nisene Marks
Corralitos
Aptos
Freedom
Salsipuedes
Seascape
La Selva
Aromas
Pajaro Dunes
CITY OF SANTA CRUZ
CITY OF CAPITOLA
CITY OF WATSONVILLE
SCOTTS VALLEY
N
W
E
S
0
2
4
Miles
180-07
PREPARED BY SANTA CRUZ COUNTY
GEOGRAPHIC INFORMATION SYSTEM STAFF
November 2007
Figure 1

This page intentionally left blank.



Project Overall Site Plan **Figure 2**

This page intentionally left blank.

II. BACKGROUND INFORMATION

EXISTING SITE CONDITIONS:

Parcel Size (acres):	490 acres
Existing Land Use:	Agricultural production, resource management
Vegetation:	Non-native grassland, restored native grassland, coast live oak woodland, coastal scrub, mixed willow riparian and wetland forest, wetlands

Slope in area affected by project: ☑ 0 - 30% ☐ 31 – 100% ☐ N/A

Nearby Watercourse:	Hanson Slough, Harkins Slough, Struve Slough
Distance To:	On Watsonville Slough Farm property

ENVIRONMENTAL RESOURCES AND CONSTRAINTS:

Water Supply Watershed:	Not mapped	Fault Zone:	Not mapped
Groundwater Recharge:	Not mapped	Scenic Corridor:	Scenic
Timber or Mineral:	Not mapped	Historic:	No
Agricultural Resource:	Type 3	Archaeology:	Partially mapped
Biologically Sensitive Habitat:	Biotic Concern	Noise Constraint:	No
Fire Hazard:	Yes	Electric Power Lines:	No
Floodplain:	Not mapped	Solar Access:	N/A
Erosion:	Not mapped	Solar Orientation:	N/A
Landslide:	Not mapped	Hazardous Materials:	No
Liquefaction:	Partially mapped	Other:	None

SERVICES:

Fire Protection:	CSA 48	Drainage District:	Zone 7
School District:	PVUSD	Project Access:	Lee Road, Harkins Slough Road
Sewage Disposal:	OWTS, CSA 12	Water Supply:	Wells, Bottled Water

PLANNING POLICIES:

Zone District:	CA	Special Designation: AIA (Airport Combining District)
General Plan:	Agriculture	
Urban Services Line:	☐ Inside	✓ Outside
Coastal Zone:	✓ Inside	☐ Outside

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

Natural Environment

County Overview. 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 Site. The project site consists of three parcels totaling 490 acres, which comprise the Watsonville Slough Farm. In addition to crop production that occurs on the site, the property contains rolling topography and riparian and wetland habitat associated with Hanson, Harkins and Struve Sloughs. The Farm property encompasses the East Branch and West Branch of Hanson Slough, a branch of the Watsonville Slough system, that bifurcates the site. The property abuts Struve Slough to the southeast and south and Watsonville Slough to the south; Harkins Slough is located to the west.

The area surrounding the project site is a mix of agricultural lands and wetlands. The California Department of Fish and Wildlife (CDFW) owns the 589-acre Watsonville Slough Ecological Reserve, which is located east of Lee Road and is managed for wetland and habitat protection. The site is located immediately south of Pajaro Valley High School and is approximately 0.5 mile from developed residential and commercial areas in the in the northern part of the City of Watsonville.

PROJECT BACKGROUND:

Watsonville Slough Farm is a working farm in active organic row crop production. The property is owned by the Land Trust and managed with the combined goals of preserving agricultural land, restoring coastal ecosystems, and connecting people with nature. The Land Trust acquired the Watsonville Slough Farm in 2010 with the support of 10 partner organizations and funding from the State Coastal Conservancy and the Wildlife Conservation Board.

The project site is located within the coastal zone, and approximately 237 acres are in current agricultural production and 243 acres consist of wetlands, grasslands, riparian forests and former agricultural fields retired for sustainability reasons. There are also 10 acres of hardscaping and disturbed land associated with former residences and outbuildings. Crop lands are leased to professional farmers, and a variety of organic crops are currently grown on the farm.

Existing facilities at the Farm include a barn and unimproved parking area at the Lee Road entrance, and two barns and a restroom at the southwestern corner of the site that are accessed via an existing farm road from Harkins Slough Road. A system of unpaved roads and trails traverse the property. Residential and other buildings that were located near the Lee Road entrance were removed in 2019 with a County demolition permit, but the utilities (water, septic, power) were retained at multiple locations.

DETAILED PROJECT DESCRIPTION:

The proposed project consists of structural and site improvements to support operation of the proposed Community Harvest Program at the Watsonville Slough Farm. As indicated above, the proposed Community Harvest Program calls for opening up areas on the Farm to local families and other visitors to harvest fruits and vegetables for their own consumption while learning about healthy food and sustainable agricultural practices.

Community harvest activities and proposed facilities and improvements would be centered in two parts of the Farm. The primary location is the Community Harvest Gateway, a 10-acre area with a driveway that is accessed off Lee Road. The secondary location is the Little Bee Barn area, which is presently accessed off Harkins Slough Road. A third area, Cypress Hilltop, is located northwest of the Gateway area, where a picnic area and restroom are planned.

Proposed facilities and improvements include:

- Rebuilding and repurposing an existing barn at the Gateway area;
- Community Harvest Program support structures and improvements:
  - Construction of two new restrooms;
  - Creation of three picnic areas and one mini-amphitheater;
  - Provision for parking and access/entry improvements;
- Improvement or installation of approximately 5 miles of new publicly-accessible trails on existing roads with approximately 0.8 miles of new trail installed;
- Development of four agricultural worker residential units;
- Upgrading existing septic systems;
- Installation of a 120,000-gallon water storage tank for fire suppression; and
- Habitat enhancement improvements.

Figure 2 shows the overall site plan and areas with planned facilities, which are further described below. Proposed improvements are summarized in Table 1.

Table 1. Summary of Proposed Facilities and Improvements

Facility/Proposed Use	Location	Size / Planned Use Capacity
Reconstructed Barn	Gateway	9,510 sq ft with 8 small offices, 2 meeting rooms, storage area
New Restrooms ◆ New Building ◆ Within Rebuilt Barn ◆ New Building	Gateway Gateway Gateway Cypress Hilltop	
Picnic Areas ◆ Covered Group Picnic Area ◆ Covered Picnic Area	 Gateway Cypress Hilltop	 Two 120 sf locations; solar panels may be added 1,320 sq ft., eight tables, including two ADA accessible.
Mini-amphitheater	Gateway	30-40 people on log benches
Parking ◆ Parking Lot ◆ Overflow Parking	 Gateway Gateway	 52 vehicles, 11 bicycle spaces Use grass in northeast part of area for overflow parking and as picnic area when not used for parking
Caretaker/Farmworker Housing	A - Gateway B - Little Bee Barn	2 units, northwest of Gateway 2 units
Trails ◆ Observation Platforms ◆ Invasive Fish Screen Boardwalks	Throughout Site	5 miles of newly accessible trails. Three observation platforms at southern & western property edge Two boardwalks west of Gateway

The proposed project will require County approval of a Coastal Development Permit, Conditional Use Permit, Conditional Site Development Permit, and Riparian Exception.

Description of Proposed Facilities and Improvements

Structures and Improvements By Area. Proposed structures and improvements in each of the three Farm areas are described below.

GATEWAY: New Barn with Offices and Restroom
Detached Restroom Building
Covered Picnic Area
Mini-amphitheater for 30-40 students
Parking Lot with 52 vehicle spaces and 11 bicycle spaces

Improvements proposed for the Gateway area include rebuilding an existing barn, construction of a restroom, and installation of two covered picnic areas, a mini-amphitheater. and an improved/landscaped parking area. The existing, approximately 4,800-square-foot existing steel barn located in this area would be demolished. The existing barn is in poor condition and would be rebuilt as an approximately 9,500 square foot multi-purpose barn, located in the same position with a similar footprint as the existing barn. A separate, detached restroom building is proposed west of the barn structure.

The new barn would accommodate offices to include: four larger offices (200 sq feet), four small offices (100 sq ft), two small meeting rooms (60 square feet) that would be used by the Land Trust and its partner organizations, including Watsonville Wetlands Watch, Esperanza Community Farms, and the Amah Mutsun Land Trust. The facility also would include storage areas and restroom for the offices.

CYPRESS HILLTOP: Picnic Area and Restroom

The Cypress Hilltop area is northwest of the Gateway Area and is a short walk from the Lee Road entrance/Gateway area along an existing unpaved farm road. A new picnic area and restroom are proposed in this location. A portion of the existing road from the Gateway Area to the Cypress Hilltop area would be improved by raising the roadbed and replacing a culvert to improve drainage in this location and reduce the steepness of the slope on the approach to the hilltop.

LITTLE BEE BARN: Special Event Area

The existing, approximate 8,220-square-foot Little Bee Barn is located at the end of a 1-mile-long driveway off Harkins Slough Road, which is partially located on adjacent property. This

area also includes an existing restroom and an approximate 13,470-square-foot barn with loading area for which no changes are proposed. The project would provide a new driveway from Harkins Slough Road as described further below. This would improve access to the Little Bee Barn area, which would be the primary location for special events. No other improvements or uses are proposed at this location, except for two farmworker housing units that are described below.

Farmworker Housing. The project includes building sites for four modular housing units for farmworker/caretaker housing; one unit would be a designated caretaker unit. Two sites are located northwest of the Gateway area (Area "A"), and two sites are located near the Little Bee Barn in the southwest portion of the site on two of the three Farm parcels (APN 052-081-34 and 052-081-37). The units would be located on a former homesite near the Lee Road entrance and on a previously permitted travel trailer site on the west side of the farm near the Little Bee Barn. The units would be located within existing hardscaped parking areas, and units would be RV-trailer type, single-bedroom units with wheels and trailer hitch. The housing sites consist of Class II Base Rock pads for Land Trust-provided mobile RV's; utilities and two parking spaces per unit would be provided. Utilities for RV's are currently installed at the proposed sites, but will require inspection by the County.

Access and Parking Improvements. Entry road improvements are proposed at the entrances at Lee Road and Harkins Slough Road, including signage, fencing and driveway transitions. The existing Lee Road entrance would be regraded and paved with pervious concrete. A new entrance would be constructed from Harkins Slough Road approximately 400 feet east of the existing entrance and would extend approximately 350 feet before connecting to the existing road that leads to the Little Bee Barn area, and would be improved with an all-weather gravel surface. The new entrance would avoid a steep hill which becomes inaccessible during the rainy season. The existing driveway off of Harkins Slough Road, which is partially located on adjacent property, would remain, but would be used for agricultural use only. Entry road improvements are proposed at both access points, including signage, fencing and driveway transitions.

Vehicle parking would be provided in previously hardscaped portions of the former residential area at the Lee Road entrance. The site plan shows 52 vehicle and 11 bicycle spaces. The parking area would include three charging stations (with stub ups for future expansion) and parking area lighting.

Utility Improvements. Project uses would be served by existing and/or upgraded utilities. An Individual Water System is proposed to be developed to provide potable water to serve the proposed farmworker housing units and offices, utilizing existing and/or new onsite wells. Prior to development of the farmworker units or occupancy of the barn, an application for an

individual water system permit shall be made to the County Health Officer in accordance with the requirements of the Santa Cruz County Code Chapter 7.73. As part of the permit application process, the Land Trust will contract with a California-licensed well driller, pumping contractor to provide a Water Yield Report demonstrating that water yield meets requirements as specified in SCCC 7.73.050. In addition, the Land Trust will submit to the Health Officer the required reports of bacteriological analysis and chemical analysis performed by a laboratory certified by the State Department of Health Services. Water would not be provided to other visitors, except bottled water would be provided for special events.

One ten-foot tall, 40-foot diameter water storage tank with a capacity of approximately 120,000 gallons would be installed for firefighting purposes. The storage tank would be situated in the northeast corner of the Gateway area along Lee Road.

The new restrooms would be vault toilets, chemical toilets or flush toilets. Flush toilets, if provided, would use existing septic systems that would be upgraded as required by Santa Cruz County Environmental Health Department. Existing septic systems would be expanded or rebuilt to serve new uses in the Gateway, Farmworker "A" and Cypress Hilltop areas. The restroom in the core Gateway is estimated to accommodate a peak use of approximately 250 users a day.

Proposed stormwater management features include a number of biofiltration planters to capture runoff from asphalt roads, and a bioswale is proposed at the new Harkins Slough Road driveway. A new 12-inch PVC culvert is proposed under the new driveway entrance off of Harkins Slough Road. In addition, a new 18-inch culvert will be placed parallel to and slightly downstream of an existing deteriorated 18-inch culvert under the dirt road that provides access to one of the farmworker housing sites and Cypress Hilltop. The culvert conveys water from Chivos Pond on the east flows to the east branch of Hanson Slough; the existing culvert would be left in place to minimize construction disturbance.

Trail Improvements. An approximate 5-mile trail system would be made newly accessible to the public. The new trail system consists of approximately 4.2 miles of existing farm roads and trails, and approximately 0.8 miles of new trail. The proposed trails would generally be approximately 3 to 5 feet wide. Approximately 700 feet of ADA accessible trail would be installed in the Gateway area from the parking area to provide access to the covered picnic areas, benches and mini-amphitheater. Trails would be designed and managed for walking. No use by dogs, bikes, motor vehicles or horses is proposed, except to accommodate people with disabilities. In addition, three proposed observation platforms are proposed on the southern and western edges of the property.

Proposed Grading. Grading is proposed for construction of the new entrance, access road off of Harkins Slough Road and for some new trails. Grading volumes for the proposed development would be approximately 9,850 cubic yards (cut) and approximately 1,900 cubic yards (fill), with approximately 7,950 cubic yards to be exported from the site. Grading will be in accordance with recommendations in the project geotechnical report, and grading during the winter is not proposed.

Habitat Enhancement. To enhance wetland habitat for California red-legged frogs (CRLFs), the project includes installation of two invasive fish screens combined with boardwalks along trails in two locations. The first invasive fish screen/boardwalk ("A") would be built over an existing road that is frequently flooded. It would allow visitors to reach the Cypress Hilltop picnic area during the winter, while avoiding farm roads that are used by growers. The second invasive fish screen/boardwalk ("B"), which is to the northwest of the first screen, would cross another branch of Hanson Slough that has no alternative crossing. These invasive fish screens/boardwalks would prevent invasive non-native fish from entering the parts of the slough upstream of these structures that support potential breeding habitat for CRLFs. Asian carp and mosquito fish occur throughout perennially inundated wetlands in the Watsonville Sloughs, significantly impairing California red-legged frog breeding. The fish screens would prevent fish from moving upstream of the structures and effectively increase the area of suitable habitat on the farm property.

Proposed Operations

Hours of Operation. The Community Harvest Program would operate throughout the year. Typical daily hours when the Farm would be open to public are 9 AM to 5 PM in the winter and 8 AM to 6:30 PM in the summer. The Farm would not be open near dusk or dawn.

Estimated Employees. Existing employees at the site include one caretaker (a Land Trust "volunteer") and one farmworker. With the project, onsite employees would increase to up to a total of 20 employees, resulting in a net increase of 18 onsite employees. The new office space in the reconstructed barn at the Gateway would accommodate up to 20 daily employees. However, the total maximum number of employees would only be expected to be onsite approximately 50% of the time. Onsite employees resulting from the project also would include four employees/residents at the four residential sites for the caretaker and farm workers.

Estimated Visitation. The Land Trust estimates approximately 50,000 annual visitors would be served by the proposed Community Harvest Program based on comparisons with the visitation at the Land's Trust's Glenwood Preserve and other visitor sites in the region, including the Elkhorn Slough Visitor Center to the south in Monterey County and the Long Marine Lab

Seymour Center to the north in the City of Santa Cruz. Visitation would be highest on weekends with an estimate peak day attendance of approximately 250 people per day on summer weekends. The proposed Community Harvest Program is intended to fill an underserved South County; and the Land Trust estimate that 80% of visitors would be from areas within a 10-minute drive of the site with the other 20% being from elsewhere around the county.

School Tours. It is expected that school tours would be provided on a regular basis in which students from all grades would be bussed to the site. Based on estimates from LifeLab and Watsonville Wetlands Watch, approximately 5,000 students per year are expected, which would be in addition to the estimated 50,000/year public visitors. It is expected that up to one bus per day with 30 students per bus would visit the site on approximately 165 days throughout the year.

Special Events. A number of special events are expected to be held throughout the year by the Land Trust and its partners, including Watsonville Wetland Watch, LifeLab, Esperanza Farms, and the Farm Bureau. Special events could occur concurrently with daily Community Harvest Program visitation. There would be no weddings or renting out the facilities. Based on typical events held by the Land Trust and its partners, 19 annual events could be held with the following attendance:

- Six events per year in the 50-100 attendee range,
- Eight events per year in the 100-150 attendee range, and
- Five per year that may be up to 250 attendees.

For events in the 50-100 attendee range, the Land Trust expects that the existing parking of approximately 50 spaces would be sufficient. For the larger events, the Land Trust would arrange for the use of overflow parking on the farm, or arranging for off-site parking and shuttling, or some other kind of "park and ride" arrangement.

Planned Construction Schedule

Construction of the proposed project components would occur in phases. Phase 1 includes elements in the Community Harvest Gateway to serve the public, including the parking area, restroom, picnic areas, and accessible trail improvements. The first phase also would include the four proposed housing units. It is expected that construction would commence in Fall of 2025 and take approximately 6 months to complete. The current target opening date for the Community Harvest Program is April 2026.

The second phase of the project includes the reconstruction of the Gateway area barn, and installation of boardwalk crossings, observation platforms and associated infrastructure. Phase

2 construction is dependent on the availability of funding and programming considerations after the implementation of Phase 1. Construction could begin in Summer 2026 and is expected to take approximately 12 months to complete with a current a target opening date of Summer 2027.

Construction Best Management Practices

The following construction best management practices (BMPs) will be implemented during construction of the project:

- To the greatest extent feasible, equipment shall be staged in ruderal and developed areas only and construction workers and equipment will access the trail alignments via existing farm roads. Project activities and operation of equipment and vehicles, including site access and parking, shall be confined to designated staging areas. The construction footprint, including removal or disturbance of existing vegetation will be minimized.
- Refueling and/or maintenance of vehicles and equipment will be performed in designated staging areas. Workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All state and federal laws pertaining to hazardous material handling and management will be followed.
- Equipment caked with mud, soils, or debris from offsite sources or previous project sites will be cleaned prior to staging equipment on site to avoid introducing or spreading invasive exotic plant species into the adjacent remaining habitats.
- All stationary equipment such as motors, pumps, generators, and/or compressors shall be positioned over drip pans. Vehicles and equipment shall be stored in designated staging area. Parked equipment shall be positioned over drip pans or absorbent material.
- During construction, all food trash that may attract predators into the work area will be properly contained and removed from the work site on a daily basis. Construction debris and trash shall be properly contained and removed from the work site on a regular basis.

III. ENVIRONMENTAL REVIEW CHECKLIST

USE OF EARLIER ANALYSES:

In analyzing the proposed project, the County may consider whether existing environmental documents already provide an adequate analysis of potential environmental impacts. An earlier analysis may be used where, pursuant to the tiering, program EIR, or CEQA provisions, if it can be determined that one or more effects have been adequately analyzed in an earlier EIR or negative declaration (State CEQA Guidelines Section 15063(c)(3)(D)).

The preparation of this Initial Study has drawn from analyses contained in the County's Sustainability Policy and Regulatory Update (Sustainability Update) EIR, which includes the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). The Santa Cruz County Board of Supervisors certified the EIR and adopted the Sustainability Update on December 13, 2022. The Sustainability Update was a comprehensive update to the County's General Plan/Local Coastal Program (LCP) that included amendments to the County's existing General Plan/LCP, including four updated General Plan elements, amendments to sections of the Santa Cruz County Code (SCCC), adoption of County Design Guidelines, and land use and/or zoning map amendments to implement map corrections and identify opportunity sites and vacant and underutilized properties. The Sustainability Update EIR reviewed all of the topics included on the Appendix G environmental checklist in the State CEQA Guidelines as well as all sections required to be included in an EIR.

A program EIR can be used for subsequent projects implemented within the scope of the program/plan and where the project is consistent with the general plan and zoning of the city or county in which the project is located. Typically, site-specific impacts or new impacts that weren't addressed in the program EIR would be evaluated in an Initial Study, leading to preparation of a Negative Declaration, Mitigated Negative Declaration or EIR. Site-specific mitigation measures included in the General Plan EIR also would be a part of future development projects, and supplemented, as may be necessary with site-specific mitigation measures identified in the subsequent environmental review process.

The Sustainability Update EIR is a "program" EIR prepared pursuant to State CEQA Guidelines section 15168, which reviewed environmental impacts associated with future development and buildout within the unincorporated county areas that would be accommodated by the General Plan/LCP. While the Sustainability Update EIR considered the impacts of repurposing, intensifying, and redeveloping existing developed parcels in the unincorporated county as a whole, specific future development of the project site was not noted or specifically evaluated in the Sustainability EIR, and there were no site-specific impacts identified for the project site. However, the Sustainability Update considered construction of new housing units and non-residential uses throughout the unincorporated county. The EIR estimates that the

Sustainability Update has the potential to accommodate approximately 4,500 housing units throughout the county over existing conditions with approximately 75% projected to occur within urban areas. The EIR also estimates the potential to accommodate approximately 6,210,000 square feet of non-residential uses, with approximately 60% expected to occur within urban areas (County of Santa Cruz 2022-Draft EIR volume). These forecasts provide 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.

The project site is located within the San Andreas planning area. For this area, the Sustainability Update EIR estimated an increase of approximately 60 residential units, 409,100 square feet of industrial uses, 212,330 square feet of service uses, and 9,110 square feet of public uses. There has not been any substantial development in the San Andreas planning area since preparation and certification of the Sustainability Update EIR. The proposed project would result in a development of four residential units with a net increase of two residential units as two units previously existed on the site and approximately 9,500 square feet of non-residential structural space. The proposed uses would be within the overall amount of development analyzed for the planning area. Even when accounting for visitation to the site as a result of the project, the estimated daily trips would be equivalent to an approximate 12,000 square foot general office or an approximate 6,000 square foot animal hospital[1], which would be within the remaining estimated development in the San Andreas planning area.

In accordance with CEQA and the State CEQA Guidelines, this Initial Study is being "tiered" from the Sustainability Update EIR. "Tiering" refers to using analyses of general matters contained in an EIR for a plan with later environmental analyses for development projects, concentrating solely on the issues specific to the later project. This approach is in accordance with State CEQA Guidelines section 15152, which encourages lead agencies to use an EIR prepared for a general plan or other program or ordinance, when the later project is pursuant to or consistent with the program or plan. The Initial Study tiers from the County's Sustainability Update EIR for the following topics:

- Air Quality – Conflicts with Air Quality Management Plan
- Energy
- Greenhouse Gas Emissions,
- Hydrology (Groundwater)
- Population and Housing,

[1] Based on average daily trips and land uses included in the Institute of Traffic Engineers Trip General Manual.

- Public Services (Fire Protection, Police Protection),
- Recreation, and
- Utilities (Solid Waste).

The Sustainability Update EIR is on file at the County's Community Development and Infrastructure Department, 701 Ocean Street, Fourth Floor, Santa Cruz, California during open public counter hours. The document also is available for review on the County's website at: https://cdi.santacruzcountyca.gov/UPC/GetInvolved/CEQAInitialStudiesEIRs/ArchivedCEQADocuments.aspx.

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: The project site is located in the coastal zone in southern Santa Cruz County that is characterized by agricultural and rural uses. According to the County's General Plan/LCP Agriculture, Natural Resources + Conservation (ARC) Element, the county supports a variety of scenic vistas and diverse scenic resources including views of open agricultural lands in the southern part of the county. The ARC Element also indicates that ocean views, agricultural fields, wooded forests, open meadows, ridgetops, and mountain hillside views are also public scenic assets that should be identified and considered during development review permit processes (ARC-5.1.1).

Scenic vistas in the project area include views of agricultural and open space lands with partial views of portions of the existing Watsonville Slough wetlands available from some segments along Highway 1. According to the County's Geographic Information Services (GIS) maps, most of the Watsonville Slough Farm property, including the proposed areas of new development and improvements, are identified as "scenic," which indicates that the site is mapped in the County of Santa Cruz General Plan/Local Coastal Program as being a location that may be considered as a potential scenic resource.

The limited, existing developed areas of the Watsonville Slough Farm, as well as proposed development areas, are primarily screened from view along Highway 1 due to intervening topography and vegetation and are not visible from other local roads, except along a portion of Lee Road. The southwestern portion of the Farm may be briefly partially visible as part of distant views to northbound Highway 1 motorists for a few seconds, but the two existing barn structures in this area are not discernible given the distance from Highway 1. Views along Highway 1 also include a mix of existing development, including industrial structures, hotels and the Pajaro Valley High School.

Areas of proposed development are primarily limited to the three areas of the Farm that are not visible from public scenic vista points. The proposed reconstructed barn in the Gateway area would be located in the same area as the existing barn, which is visible from a portion of Lee Road adjacent to the Farm, and the upper roofline is visible only very briefly from Highway 1. The new barn would be of similar or less massing, height and appearance as other agricultural barns and industrial and institutional structures in the area, and thus, would not result in an adverse impact to existing views, although the upper portion may be briefly

visible from Highway 1. However, proposed landscaping with at the Gateway entrance with evergreen trees also would serve to partially screen potential visible portions of the barn. The two proposed restrooms and farmworker housing units would be small, low profile structures that would not be visible from public vantage points and are not part of scenic views due to intervening topography and vegetation. Thus, the proposed project structures would not be visible from public scenic views, except from a limited portion of Lee Road and Highway 1 as currently exists, but would be partially screened by landscaping. Therefore, the project would not have a substantial adverse effect on a scenic vista, resulting in a *less-than-significant impact* on scenic vistas.

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

***Discussion*:** The project site is not located along a designated state scenic highway. The Watsonville Slough Farm is located west of Highway 1 and west of Lee Road and is within 0.25 mile of Highway 1, but Highway 1 is not officially designated State Scenic Highways[2]. However, Highway 1 is considered a scenic road in the County's General Plan/LCP. The County's General Plan/LCP identifies a number of local roads and highways that "are valued for their vistas," but none of the other roads in the vicinity of the project site, such as Harkins Slough Road or Lee Road, are identified on this list.

The limited, existing developed areas of the Watsonville Slough Farm, as well as proposed development areas, are primarily screened from view along Highway 1 due to intervening topography and vegetation, as well as proposed landscaping, as discussed above. Furthermore, Highway 1 is not a state-designated scenic highway, and the project would not damage scenic resources. Therefore, the project would result in no impact to scenic resources within a state-designated scenic highway.

[2] California Department of Transportation (Caltrans). 2023. Scenic Highways. Accessed January 26, 2024 at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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*:** The existing visual setting in the project area is characterized as a rural setting with a mix to agricultural fields and operations, wetlands, and rural development. The Pajaro Valley High School is located immediately north of Harkins Slough Road. The proposed project would result in limited new development that would be designed and landscaped so as to fit into this rural setting. Most of the project improvements, including farmworker housing, are located in areas that are not visible from public vantage points. New construction at the Gateway off Lee Road would be visible, including the new parking area and re-constructed barn. The proposed landscaping would provide for partial screening of the parking lot from the limited views of this area from Lee Road. In addition to retention of three existing trees, the new parking lot located off of Lee Road would be landscaped with 15 evergreen trees on the perimeter of the lot and 15 deciduous trees within the interior area.

The new barn at the Gateway area would be located in the same location as the existing barn and would be of similar height, massing and design as other typical barn structures in the County's rural agricultural areas. The reconstructed barn with a second story would be approximately 40 feet in height, consistent with County regulations. The new restroom at the Gateway area also would be a single-story, small, low-profile structure with a wood exterior. The project also is designed to be consistent with SCCC sections that regulate height, bulk, density, setback, landscaping, and design of new structures in the County, including SCCC Chapter 13.11, Site Development and Design Review, including all applicable design guidelines.

A new, 120,000-gallon water storage tank is planned along Lee Road north of the Gateway area. The structure would be approximately 10 feet in height and 40 feet in width, finished with a subdued natural color. A vegetative screen will be planted around the perimeter of the tank. Although, this facility would be visible from limited areas along Lee Road, the size and massing would be similar to and typical of other water storage facilities in the area and other rural areas within Santa Cruz County.

Views of the Gateway area and new water storage tank would be limited to the area on Lee Road directly adjacent to the site, and the prominent structural views in the vicinity are views of the Pajaro Valley High School to the north, which is larger and more massive than the proposed structures. The proposed structures would be similar to or less than size and massing of other structures in the vicinity, both agricultural and public facility structures. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, resulting in a less-than-significant impact.

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 due to limited exterior lighting on the new barn and four small residential structures. However, this increase would be minimal and would be similar in character to the lighting associated with the surrounding existing uses. Therefore, the project would not create a new source of substantial light or glare, resulting in a less-than-significant impact.

B. Agriculture and Forestry Resources

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

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

Discussion: Portions of the Watsonville Slough Farm property contains lands designated as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency that were updated for Santa Cruz County in 2020 (California

Department of Conservation, 2023). The property does not contain any areas mapped as Farmland of Local Importance. However, the sites where new development is proposed, including the new barn, new restrooms, four residential units, and outdoor picnic areas are in areas that are not mapped as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and thus, prime agricultural lands would not be converted to a non-agricultural use. No temporary or permanent impacts to prime agricultural lands would occur from project implementation.

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

***Discussion*:** The project site is zoned CA (Commercial Agriculture) and AIA (Airport Overlay). The proposed uses are allowed within the CA zone. The project site is not under a Williamson Act contract. Therefore, the project does not conflict with existing zoning for agricultural use or with a Williamson Act contract. Therefore, the project would result in no impact.

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

***Discussion*:** The project is not located on or near land designated as Timber Resource. Therefore, the project would not affect forest resources or access to harvest the forest resources in the future. Therefore, the project would result in no impact.

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 as discussed above. Therefore, the project would result in no impact regarding loss or conversion of forest land.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*	☐	☐	☐	✓

Discussion: The project site and surrounding area contain lands designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. However, as indicated above, the sites where new development is proposed are not in areas mapped as Prime Farmland, Unique Farmland, Farmland of Statewide Importance. Furthermore, the purpose of the proposed Community Harvest Program is directly in support of existing onsite agricultural uses and would allow local families and other visitors to harvest fruits and vegetables for their own consumption while learning about sustainable agricultural practices. The proposed project would not result in uses that could indirectly lead to conversion of farmland to non-agricultural uses. In addition, the project site contains no forest land, and no forest land occurs in the area, which is predominantly agricultural. Therefore, the project would result in no impact related to potential conversion of agricultural and forest lands.

C. Air Quality

The significance criteria established by the Monterey Bay Air Resources District (MBARD)[3] 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 site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD), and includes Santa Cruz, Monterey, and San Benito Counties. MBARD's Air Quality Management Plan (AQMP) was prepared to address attainment of the state ambient air quality standards (AAQS) and maintenance of the federal AAQS. Population-related emissions have been forecast in the AQMP using population forecasts adopted by AMBAG. According to the MBARD's "CEQA Guidelines (2008), projects that result in an increase in population or housing units that are consistent with growth projections used in the Plan would be considered consistent with the AQMP. Additionally, according to the MBARD's CEQA Guidelines, consistency of indirect emissions associated with commercial, industrial or

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

institutional projects intended to meet the needs of the population as forecast in the AQMP also is determined by comparing the estimated current population with the applicable population forecast in the AQMP.

The Sustainability Update EIR concluded that potential development that could be accommodated by the Sustainability Update and which was evaluated in the EIR would not conflict with or obstruct implementation of the applicable air quality plan as dwelling unit estimates and population were within population estimates included in the AQMP. As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of potential conflicts with the AQMP, which concluded the impact would be less than significant. Therefore, the project would not conflict with or obstruct any applicable air quality plans of the MBARD and would result a less-than-significant impact.

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 State Air Resources Board (ARB) designates a status for regional air basins as being in attainment or nonattainment with State air quality standards. The federal Environmental Protection Agency (EPA) provides the designation for National standards. The NCCAB is in attainment or unclassified status for federal air quality standards, and no national attainment plans apply to the region. The NCCAB is designated as a non-attainment area for the state PM_{10} standards and is designated as unclassified or attainment for all other state and federal standards (County of Santa Cruz 2022).

The project would result in operational criteria pollutant 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). However, emissions would not be expected to exceed any applicable MBARD thresholds as the proposed uses are below the MBARD's screening level for the amount of development that could result in potentially significant criteria pollutant air emissions (Monterey Bay Air Resources District 2008). No stationary sources would be constructed as part of the project.

Therefore, project operations would indirectly result in air pollutant emissions that would result in a less-than-significant impact.

Project construction may result in a short term, localized decrease in air quality due to generation of PM_{10}. Emissions from construction activities represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of project. Project construction would have a limited and temporary potential to contribute to existing violations of California air quality standards for ozone and PM_{10} primarily through diesel engine exhaust and fugitive dust. However, Information from the MBARD's "CEQA Air Quality Guidelines" indicate that 8.1 acres could be graded per day with minimal earthmoving or 2.2 acres per day with grading and excavation without exceeding the MBARD's PM_{10} threshold of 82 lbs/day.

Project construction and access, trail and habitat enhancement improvements would occur at multiple sites, but grading would be limited to the new facilities at the Gateway area and for the residential units, but would result in minimal grading as the sites are relatively flat. The total project site area where construction disturbance would occur is estimated at approximately 2 acres, although the entire area would not be graded or disturbed in one day, and the project would be constructed in two phases. Thus, the area of disturbance would be below MBARD's daily grading threshold.

Therefore, the project would not significantly contribute to existing or projected air quality violations, and would not result in a cumulatively considerable net increase in criteria pollutant emissions, resulting in a less-than-significant impact. Furthermore, 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: For CEQA purposes, a sensitive receptor is defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes (MBARD 2008). Pajaro Valley High School is the closest sensitive receptor in the vicinity of the project, which is located approximately 0.5 north of the Gateway project area were new construction is

planned. There are no other nearby sensitive receptors include in the vicinity of planned project improvements and construction.

The proposed project would not generate substantial pollutant concentrations as explained above. Emissions from construction activities represent temporary impacts that are typically short in duration. Project construction is expected to occur over an approximate 18-month period over the course of two phases.

Construction equipment emissions include diesel exhaust, which 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 project is located in a rural agricultural area, and the nearest sensitive receptors are approximately 0.5 mile from the project construction area. Since construction is anticipated to occur over a 6-month period for the first phase and 1 year for the second phase, the sensitive receptors would be affected for a maximum of 78 weeks, which is less than 2% of the 70-year maximum exposed individual criteria used for assessing public health risk due to emissions of certain air pollutants (MBARD 2008). Due to the intermittent and short-term temporary nature of construction activities, emissions of DPM would not be sufficient to pose a significant risk to sensitive receptors from construction equipment operations during the course of the project. Therefore, the project would not be expected to expose sensitive receptors to substantial pollutant concentrations, resulting in a less-than-significant impact.

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. 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 north of the project site at Watsonville High School). 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. Thus, the project would not create objectionable odors affecting a substantial number of people, and the project would result in a less-than-significant impact.

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: According to the County's GIS maps, the project site is located in an area of biotic concern for areas with mapped biotic resources and also is in an area of biotic concern for Santa Cruz long-toed salamander range. A Biotic Assessment was prepared for this project by Ecosystems West Consulting Group, dated March 2023 and updated in February 2024 (Attachment B). This report has been reviewed and accepted by the Planning Department Environmental Planning section (Attachment B). The report analyzes biotic resources within areas of proposed development and improvements and determined that habitat for a number of special status species occurs on the project site that are summarized below and fully discussed in the biotic assessment report in Attachment B.

Special Status Species. No special-status plant species were observed within the project study area during focused rare plant surveys in 2020 and 2021 or during other site visits in subsequent years during the blooming period for target species. Two special-status plants, Santa Cruz tarplant (*Holocarpha macradenia*) and Congdon's tarplant (*Centromadia parryi ssp. congdonii*), were considered to have a "high" potential for occurrence due to the proximity of known occurrences, suitable habitat types, and designation of federal Critical Habitat for Santa Cruz tarplant.

The project site is situated within U.S. Fish and Wildlife Service (USFWS)-designated Critical Habitat for the Santa Cruz tarplant. However, despite focused rare plant surveys, neither Santa Cruz tarplant nor Congdon's tarplant was observed within the project study area. It remains possible, although unlikely, that dormant tarplant seedbank(s) are present. However, the majority of grasslands remaining on the Watsonville Slough Farm property were previously in row crop agriculture for many decades, and tilling and other farming practices likely displaced remaining viable seed from study area.

The study area supports suitable habitat for special-status wildlife species including: federally threatened California red-legged frog (CRLF); state endangered bald eagle; state threatened tri-colored blackbird; state Fully Protected golden eagle, American peregrine falcon, and white-tailed kite; and the following State Species of Special Concern: western pond turtle, northern harrier, western burrowing owl, olive-sided flycatcher, yellow warbler, grasshopper sparrow, western red bat, and San Francisco dusky-footed wood rat.

The surveys conducted for the Biotic Assessment followed the methods outlined in agency protocols to conduct habitat site assessments for federally-listed amphibians, including Santa Cruz long-toed salamander and California tiger salamander, although formal protocol-level surveys were not conducted as part of this effort. The project site is mapped in the County's GIS as being in the Santa Cruz long-toed salamander range. Based on surveys and review, the Biotic Assessment concluded that long-toed salamander and California tiger salamander are not expected to occur within the project site or biological study area based on lack of suitable habitat, distances to known occurrence locations, and intervening barriers to movement.

Nesting Birds-Migratory Bird Treaty Act. The project site provides potential nesting habitat for birds of prey, and migratory birds protected under the California Fish and Game Code, and the Federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711). Under the MBTA, it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird unless and except as permitted by regulations. 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).

The bald eagle, the golden eagle, the white-tailed kite, and other raptors, including owls, may utilize larger trees in the vicinity for nesting. If present, the peregrine falcon may utilize steeper clifflike embankments for nesting. If present, Lawrence's goldfinch, oak titmouse, yellow warbler, and olive-sided flycatcher may utilize oak woodland, riparian, ornamental trees, and/or coastal scrub for nesting.

***Impacts*:** The Biotic Assessment report identified potentially significant impacts to several special status species and recommends measures to avoid or minimize impacts as discussed below. These recommendations, as well as 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.

Special Status Species. No sensitive plant species were identified within the Study Area, nor are they expected to occur. No impacts to sensitive plant species are anticipated to result from the proposed Project. Minor impacts to non-native grassland within the Study Area are not considered a significant impact to Santa Cruz tarplant Critical Habitat in the Biotic Assessment.

The proposed project could result in potentially significant, temporary impacts to CRLF and western pond turtle during construction of the two boardwalks across Hanson Slough, the three observation platforms along Harkins and Struve Sloughs, and limited natural surface trail segment improvements. Potential impacts include potential harm to animals that may be in the construction area and temporary reduction of available habitat for both species. However, recently documented CRLF breeding habitat is located in the southernmost portion of the biological study area where no project improvements are proposed, and impacts to potential non-breeding aquatic and upland habitat would be very minimal in locations with proposed improvements. On-going maintenance activities, such as mowing, pruning, and trail repairs also could also result in temporary, direct impacts to these species. Implementation of mitigation measures during construction would reduce impacts to a less-than-significant level, including limiting timing of construction installation of exclusion fencing, environmental training, and biological monitoring. In addition, implementation of erosion and water quality protection measures would reduce potential construction-related impacts to less than significant.

The areas containing coastal scrub, mixed riparian and oak woodland provide suitable habitat for the San Francisco dusky-footed woodrat. Vegetation removal in in these habitats may directly impact woodrats or their houses, if present. Construction may directly impact woodrat individuals if present within the work area. Woodrat houses were observed in the riparian forest along the southern boundary of the Watsonville Slough Farm. Implementation of the pre-construction surveys and avoidance or relocation measures would reduce potential impacts to woodrats to a less-than-significant level.

Western red bat and other sensitive bat species may utilize the riparian forest for roosting. Common bats may utilize the steel barn, oak woodland, riparian habitats, and ornamental trees for roosting. Bat maternity roosting occurs typically between May 1 and September 1, and winter hibernacula (shelter occupied during the winter by a dormant animal) for many bat species are found between November 1 and February 15. The proposed barn demolition and

reconstruction and construction near trees could result in potentially significant impacts related to disturbance to roosting bats, if present. All roosting bats, including individual roosts, winter hibernacula, and maternity roosts, are protected under California Fish and Game Codes. Implementation of pre-construction surveys and protection of roosts if found would reduce the impact to a less-than-significant level.

The project would introduce an increase in pedestrian use of Watsonville Slough Farm, and human presence may result in increased harassment, injury, and mortality of CRLF through trampling, and interference with CRLF movement, dispersal, and other life events. The increased human presence also may degrade CRLF habitat through trampling, compaction of small mammal burrows, alteration of the native vegetation, increased trash, and pollution of aquatic habitat. However, visitor access would be controlled and monitored by Land Trust staff reducing the impact from increased pedestrian use to a less-than-significant level.

Nesting Birds. As indicated above, all migratory bird species are protected by the MBTA. The project area provides potential nesting habitat for birds of prey and birds listed by the MBTA as identified above. A number of species were observed that have a potential to nest in the project area, although no observed nests were reported as part of the Biotic Assessment prepared for the project. Birds that were observed during surveys conducted for the Biotic Assessment include: bald eagle, which is known to nest west of the project site along Gallighan Slough; golden eagle, which has been documented in and near the project site during breeding season; white-tailed kite; yellow warbler, which was observed in the project study area during nesting season; Lawrence's goldfinch; and oak titmouse. The burrowing owl (wintering) and tricolored blackbird are unlikely to be affected by project construction activities, which would not occur during winter months when these species may be present in the Study Area.

Construction during the avian breeding season (February 1 to September 1) may disrupt breeding activities, cause nest abandonment or failure, or directly harm or cause mortality to nesting birds, eggs, and young located within the project construction areas, resulting in a potentially significant impact to special status species and species protected under the MBTA. Lighting associated with Program improvements also could negatively impact birds and other wildlife species. Conducting pre-construction nesting bird surveys with implementation of protective measures if nests are found, as well as measures to control lighting, would reduce the impact to a less-than-significant level.

Mitigation Measures:

BIO-1: *Pre-construction Surveys.* Prior to commencement of any vegetation removal (including clearing and grubbing), a qualified biologist shall survey the project disturbance area to identify the presence of any special-status species.

BIO-2 *Areas to Be Protected During Construction.* Prior to initiation of construction activities, a USFWS- and CDFW-approved biologist shall identify areas to be protected with exclusion fencing and all areas requiring monitoring a USFWS- and CDFW-approved biologist. Prior to commencement of construction, high visibility exclusion fencing and/or flagging shall be installed with the assistance of a qualified biologist to indicate the limits of work and prevent inadvertent grading or other disturbance within the adjacent sensitive habitat areas.

A. No work-related activity including equipment staging, vehicular access, grading and/or vegetation removal shall be allowed outside the designated limits of work.
B. Native trees to be retained near or within the project impact area shall be identified, protected with high visibility fencing at or outside of the dripline, and avoided during construction as sensitive habitat unless additional protection measures, provided by a qualified arborist, have been reviewed and approval by Environmental Planning Staff.
C. The fencing shall be inspected and maintained daily until project completion.

BIO-3 *Exclusion Fencing.* Prior to initiation of construction activities, the construction contractor shall install exclusion fencing (solid silt fencing) in specified areas along the work area boundaries, 6 inches below grade and 3.0 feet above grade, with wooden stakes at intervals of not more than 12 feet. The fence shall be maintained in working order for the duration of construction activities.

- The USFWS-approved biologist or designated trained construction monitor shall inspect the fence daily and notify the construction foreman when fence maintenance is required.
- The fence shall allow for wildlife passage across the work area at intervals to be determined in conjunction with USFWS and CDFW.

BIO-4: *Construction Worker Training.* Prior to commencement of construction every individual working on the Project must attend biological awareness training by a USFWS-approved biologist prior to working on the job site. The training shall include at minimum information regarding the following:

A. Location and identification of sensitive habitats and all special-status species with potential to occur in the project area including information specific to identifying

these species, including a description of CRLF and its habitat, and measures to protect CRLF, and other sensitive wildlife species known or with potential to occur (western pond turtle, nesting avian species, San Francisco dusky-footed wood rat, and roosting bats) in the project study area.

B. The importance of avoiding impacts to special-status species and their habitat, penalties for damaging habitat, and the steps necessary if any special-status species is encountered at any time.

C. Best management practices to be implemented, identification of the limits of work, and project-specific avoidance measures and permit conditions that must be followed.

BIO-5: *Biological Monitoring During Construction*. A qualified USFWS-approved biologist shall be on site to monitor all initial clearing and grubbing and ground-disturbing activities associated with the project.

A. A single person on the jobsite (either the qualified biologist or a designated daily monitor) shall be responsible for daily monitoring activities which shall include:
   1. Checking under all equipment for wildlife before use.
   2. Inspecting all trenches, pipes, culverts or similar structures for animals prior to burying, capping, moving, or filling.
   3. Ensuring that at the end of each workday, all excavations shall be secured with a cover, or a ramp installed to prevent wildlife entrapment.

BIO-6: *Construction Timing*. If feasible, construction activities in and adjacent to the sloughs shall take place during the dry season and before the first rain of the season, especially vegetation removal. Avoid working at night or during rain events when special-status amphibians and mammals are generally more active. Consult weather forecasts from the National Weather Service at least 72 hours prior to performing work.

BIO-7: *California Red-Legged Frog (CRLF) and Western Pond Turtle (WPT) Protection Measures*.

A. During vegetation removal in or adjacent to the sloughs, with the authorization of the USFWS and CDFW, the agency-approved biologist will be present (or on call) to relocate CRLF (and WPT) as needed. The approved biologist shall have the authority to stop work that may result in the "take" of a special-status species. The biologist will thoroughly check all vegetation for CRLF, WPT, and other wildlife species prior to vegetation removal activities.

B. The approved biologist or construction monitor will check under all equipment for wildlife before use. If any special-status wildlife is observed under equipment

or within the work area, the approved biologist will be permitted to handle and relocate it.

C. At the end of each work day, excavations shall be secured with a cover, or a ramp installed to prevent wildlife entrapment.

D. All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.

BIO-8: To minimize take of CRLF during maintenance activities, restrict mowing and pruning to the dry season, after April 15 if feasible, or wait at least 2 weeks after March or April rains.

BIO-9: To minimize vehicle strikes of CRLF, if feasible, restrict parking to daytime hours.

BIO-10: *San Franciso Dusky-Footed Woodrat Pre-construction Survey*. Prior to construction, a qualified biologist shall conduct a preconstruction survey for woodrat houses, and clearly flag all houses within the construction impact area and immediate surroundings.

- The construction contractor shall avoid woodrat houses to the extent feasible by installing a minimum 10-foot (preferably 25-foot) buffer with silt fencing or other material that shall prohibit encroachment.
- If this buffer and avoidance is not feasible, the qualified biologist shall allow encroachment into the buffer, but preserve microhabitat conditions such as shade, cover and adjacent food sources.
- If avoidance of woodrat houses is not possible, in coordination with CDFW, a qualified biologist shall develop and implement a San Francisco Dusky-footed Wood rat Relocation Plan.

BIO-11: *Bat Protection Measures*. If feasible conduct limbing/tree removal operations between September 15 and November 1 to avoid bat maternity roosts and winter hibernacula, as well as other sensitive biological resources.

BIO-12: *Bat Protection Measures*. To avoid impacts to individual roosts, winter hibernacula, and maternity roosts, during all months, prior to limbing/tree removal, or rehabilitation of the steel barn a qualified biologist shall conduct a pre-construction survey for bats to determine if crevice or foliage roosting bats are present, as follows:

- A qualified biologist shall determine if bats are utilizing the site for roosting. For any buildings or trees/snags that could provide roosting space for cavity or foliage-roosting bats, potential bat roost features shall be thoroughly evaluated

to determine if bats are present. Visual inspection and/or acoustic surveys shall be utilized as initial techniques.

- If roosting bats are found, the biologist shall develop and implement acceptable passive exclusion methods in coordination with or based on CDFW recommendations. If feasible, exclusion shall take place during the appropriate windows (September land November 1) to avoid harming bat maternity roosts and/or winter hibernacula. (Authorization from CDFW is required to evict winter hibernacula for bats).
- If established maternity colonies are found, in coordination with CDFW, a buffer shall be established around the colony to protect pre-volant young from construction disturbances until the young can fly; or implement other measures acceptable to CDFW.
- If a building or tree is determined not to be an active roost site for roosting bats, proceed with work immediately. For trees to be limbed or removed, proceed as follows:
  - If foliage roosting bats are determined to be present (e.g. hoary bat or western red bat), limbs shall be lowered, inspected for bats by a bat biologist, and chipped immediately or moved to a dump site. Alternately, limbs may be lowered and left on the ground until the following day, when they can be chipped or moved to a dump site. No logs or tree sections shall be dropped on downed limbs or limb piles that have not been in place since the previous day.
  - If the tree is not limbed or removed within four days of the survey, the survey efforts shall be repeated.

BIO-13: *Nesting Birds.* The avian breeding season occurs between February 1 and September 1. If feasible, perform vegetation removal activities outside of breeding bird season to avoid direct harm or mortality to potential nesting bird species and other sensitive biological resources. For all project activities initiated during the breeding bird season, or if construction activities lapse for a period of one weeks or more during breeding bird season, a qualified biologist will conduct a breeding bird survey for nesting birds, including raptors. The survey will include potential habitat for raptors and sensitive and common nesting avian species known to occur within the Study Area.

- Surveys will be conducted within 7 days, prior to beginning construction activities and will include all work, staging, access areas, and minimum survey radii surrounding the work area as follows:
  - 250 feet for non-raptors;
  - 500 feet for small raptors such as accipiters; and

- 1,000 feet for larger raptors such as buteos.

- If no nesting sensitive or common avian species are observed during breeding bird surveys no additional measures would be required.
- If common nesting birds are observed within or adjacent to vegetation proposed for removal, postpone vegetation removal activities until young have fledged to avoid direct harm or mortality of nesting birds and/or establish buffers depending on the activity and appropriate to the species.
- Sensitive bird species, if nesting in or near the Project Area, will be given special consideration and may require additional protective measures as determined through consultation with the relevant agency (USFWS or CDFW):
  - Bald eagle, golden eagle: 1,300 feet;
  - Northern harrier, white-tailed kite, and other raptors: 300 feet;
  - Lawrence's goldfinch, grasshopper sparrow, yellow warbler: 75 feet; and
  - Oak titmouse, olive-sided flycatcher: 50 feet.

  A qualified biologist will monitor active nest sites for construction-related disturbances and adjust protective buffers as necessary to prevent further disruption of nesting activities.

BIO-14: S*ensitive Bird Species*. The following measures will be implemented as Best Management Practices to protect wintering sensitive bird species, if present:

- If any work is performed during the burrowing owl and tricolored blackbird wintering period (November - March), conduct a survey for these species.
- The survey will be conducted by a qualified biologist and include the project area and suitable habitat within 150 meters (490 feet).
- If burrowing owls are detected:
  - Place visible markers near occupied burrows and fence off suitable habitat;
  - Avoid direct destruction of burrows, and
  - Include the burrowing owl in the environmental training for construction personnel
  - To avoid potential burrowing owl habitat, to the greatest extent feasible, avoid destruction of fossorial mammal burrows during construction.
- CDFW may require additional protective measures for wintering tricolored blackbirds, if observed.

BIO-15: *Control Lighting.* To reduce potential impacts to sensitive habitats and special-status species that may result from artificial light, the following shall be adhered to:

A. The project shall avoid the installation of any non-essential artificial lighting. If artificial lighting is necessary, the project shall avoid or limit the use of artificial

lights during the hours of dawn and dusk, when many wildlife species are most active.

B. All essential outdoor lighting shall be limited through the use of timers and/or motion sensors.

C. All essential outdoor lighting shall be shielded, cast downward, and directed such that it does not shine off the property into surrounding areas, other parcels, or the night sky.

BIO-16: *Special Status Species Encountered During Construction*. If any individual special-status species is found at any time prior to or during construction, work shall cease immediately in the vicinity of the individual and likely to be injured or killed by work activities, it shall either be allowed to move out of harm's way on its own or a qualified biologist, with the authorization of the USFWS and CDFW, shall move it to the nearest suitable habitat outside of the project impact area. The biologist shall be allowed enough time to move any special-status species from the site before work activities begin.

BIO-17: *Western Pond Turtle Discovery*. If a western pond turtle egg clutch is discovered during pre-construction surveys, or at any time during construction, work in the vicinity of the egg clutch shall be halted immediately. Unless otherwise advised by CDFW, the nest location shall be surrounded with high visibility fencing under the guidance of a qualified biologist and shall be avoided until the biologist determines that the clutch has hatched and individuals are no longer likely to be injured by work activities.

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. A Biotic Assessment was prepared for this project by Ecosystems West Consulting Group, dated March 2023 and updated in February 2024 (Attachment B). This report has been reviewed and accepted by the Planning Department Environmental Planning section (Attachment B). The Biotic Assessment identifies eleven habitat types within the biological study area: non-native grassland, restored native grassland, coast live oak woodland, coastal scrub, mixed willow

riparian and wetland forest, palustrine emergent wetlands and scrub/shrub wetlands, aquatic, agricultural fields, ornamental trees, ruderal, and developed. The restored coastal prairie grassland in the Study Area is located immediately northwest of the confluence of Struve Slough and the West Branch of Hanson Slough.

The Biotic Assessment determined that riparian (mixed willow riparian forest) and four other sensitive habitats (coastal scrub, coast live oak woodland, wetland and aquatic) occur on the project site. Sensitive natural communities on the project site are summarized below; wetlands are discussed in the following section. In addition to the habitat types listed above, areas that support sensitive species would also be considered sensitive habitats under the County of Santa Cruz LCP and Sensitive Habitat Ordinance. Within the Study Area, CRLF refuge, upland, movement and dispersal habitats also would be considered sensitive habitats. CRLF are known to move directly between aquatic (breeding and non-breeding) habitats, and juvenile frogs may disperse from their natal habitat in all directions.

Mixed-willow riparian habitat primarily occurs along the margins of Harkins Slough, Hanson Slough, Struve Slough, Watsonville Slough, and Chivos Pond. It provides habitat and movement corridors for a variety of common and special-status wildlife species. Tree-sized arroyo willow and Pacific willow dominate this riparian forest habitat type.

Coastal scrub is considered an environmentally sensitive habitat area (ESHA) in the County's LCP and in Chapter 16.32 of the SCCC. On the project site, the disturbed, early successional phase of *Baccharis pilularis* Alliance habitat does not meet the criteria for ESHA due to the prevalence of weeds and other perturbations (e.g., invasive weeds, buried asphalt, industrial refuse. Coastal scrub is located primarily on the sloped embankments above Hanson Slough and Harkins Slough.

Coast live oak woodland is limited and fragmentary, occurring only in several small areas. The most notable stand occurs close to the proposed trail alignment above the West Branch of Hanson Slough. The coast live oak woodland is situated on a steep embankment in a habitat mosaic comprised of mixed willow riparian forest, freshwater marsh, agricultural fields, and coastal scrub. Within this narrow zone, the overstory canopy patchy but dominated by very large, multi-trunked oaks. Another small patch of coast live oak woodland occurs near the southern terminus of Harkins Slough immediately west of the Little Bee Barn. In this area, the canopy is mostly closed and supports several very mature oaks with an understory of invasive grasses and poison hemlock.

Impacts: Project construction would result in a minor loss of approximately 0.06 acres of sensitive habitat: coastal scrub (0.01 acres), coast live oak woodland (0.02 acres), and mixed

willow riparian/wetland forest (0.03 acres). Impacts to wetlands are addressed in the next section.

The project would permanently impact 0.03 acres (approximately 1,310 square feet) of riparian woodland. During construction of the boardwalk crossings, activities such staging, equipment access, construction of temporary access roads, construction of abutments and the boardwalk approaches may result in temporary disturbances to mixed willow riparian forest, largely limited to pruning or limbing to allow for access. Some grubbing or grading may be required. If severely pruned or limbed, it is anticipated that mixed willow riparian vegetation would resprout from the stumps and roots. Permanent and temporary impacts to willow riparian would be mitigated onsite (or in close proximity) as necessary through in-kind replacement and/or enhancement.

The project would result in minimal impacts to coastal scrub. Construction would permanently impact 0.01 acres (575 square feet) of sensitive coastal scrub. Equipment access, grubbing, vegetation removal, excavation, grading, and trail construction would result in permanent impacts to coastal scrub. Any vegetation removed would be replaced in-kind onsite. Where permanent loss occurs, this impact would be mitigated through in-kind replacement or enhancement in close proximity to the area of disturbance.

Although coast live oak trees are not proposed for removal, approximately 0.02 acres (1,000 square feet) of associated understory habitat will be permanently impacted by a new trail segment above the West Branch of Hanson Slough. Mitigation could include restoration or enhancement of the coast live oak woodland by planting additional trees or removing invasive weeds and planting native understory species including California blackberry, snowberry, and coffeeberry.

Portions of the project will occur within County defined riparian corridors including the viewing platforms, boardwalks, and trail improvements. In order to conduct work within a County-defined riparian corridor, the project must be granted a riparian exception by the County. Conditions of approval listed in the riparian exception must be adhered to. Prior to the approval of any riparian exception, a specific set of findings must be met. The Planning Department has determined that the project meets the County's findings for a Riparian Exception (SCCC 16.30.060), and Draft Findings are included in Attachment B.

The proposed Community Harvest Program would introduce increased visitation to the Watsonville Slough Farm property that could lead to degradation of sensitive habitats through introduction of additional invasive weeds, off-trail trampling and compaction, alteration of the native vegetation, increased trash, urine and fecal matter, and pollution of

aquatic habitat. The Land Trust proposes staff presence, signage, fencing and hours of operation to manage visitor use and avoid potential indirect impacts to sensitive habitat areas. The project also proposes implementation of BMPs to avoid indirect water quality impacts.

***Mitigation Measures*:** Implementation of Mitigation Measures BIO-2 and BIO-3 above (protection of sensitive areas during construction) and the following mitigation measure would reduce significant impacts to a less-than-significant level.

BIO-18: *Sensitive Habitat Replacement*. To comply with Santa Cruz County General Plan Policy 5.1.12, SCCC Section 16.32.090 (C)(1)(a), and to compensate for impacts to Coastal Scrub, Coast Live Oak Woodland, Mixed Willow Riparian, Seasonal Wetlands, Freshwater Marsh, and Aquatic Habitat (Hanson Slough) and inadvertent impacts that will result from future use of the project site, the following shall be adhered to:

A. All areas temporarily disturbed as a result of the project shall be restored to pre-project contours to the maximum extent possible and re-vegetated with native plant species appropriate to the habitat disturbed.
B. All sensitive habitats permanently impacted as a result of the project shall be compensated for at a minimum 2:1 ratio through restoration or establishment of in-kind habitat at designated restoration areas on site.
C. A Habitat Restoration Plan prepared by a qualified biologist or restoration specialist shall be submitted to, and approved by, the County Environmental Coordinator prior to the final CEQA determination.

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*:** The Watsonville Slough Farm property is situated on the terraces and slopes adjacent to, and above, the greater Watsonville Sloughs system which is one of the largest remaining freshwater marshlands in the State's coastal zone. This slough system has six interlinked, freshwater sloughs. The farm encompasses the East Branch and West Branch of Hanson Slough (including Chivos Pond, a northeastern finger of the East Branch) to its confluence with Struve Slough, and abuts Struve Slough to the southeast and south, Watsonville Slough to the south, and Harkins Slough to the west.

Onsite wetland habitats include palustrine emergent wetland types, including seasonal wetland, seep wetland, and emergent freshwater marsh associated with Hanson Slough, Harkins Slough, and Struve Slough. Seasonal wetlands are characterized by shallow depressional topography with inundation and/or saturation only occurring during the rainy season. These features are typically dominated by annual and perennial grasses and forbs, many of which may occur in both wetland and upland habitats (i.e., facultative [FAC] wetland species). Four seasonal wetlands totaling 3.76 acres were identified within the biological study area.

Emergent freshwater marsh, totaling 6.42 acres, occurs along the shoreline fringe and within shallow areas throughout the inundated portions of the Watsonville Sloughs encompassed by the greater Community Harvest Study Area. These marshy areas are dominated entirely by perennial, emergent wetland vegetation including cattails (*Typha latifolia*), bulrush (*Schoenoplectus californica*), western goldenrod (*Euthamia occidentalis*), broadfruit bur-reed (*Sparganium eurycarpum*), marsh pennywort (*Hydrocottle ranunculoides*) and water smartweed (*Polygonum amphibium*). The majority of these areas are recovering from past agricultural activities including draining and farming the majority of the slough bottomlands. Hydrology was restored to the sloughs and naturalized vegetation was allowed to reestablish in the early 2000s. Active restoration is currently being undertaken by various resource agencies and land management organizations including the Land Trust of Santa Cruz County, Watsonville Wetlands Watch, CDFW, USFWS and the City of Watsonville.

Aquatic habitat is composed of unvegetated, natural and man-made open bodies of water. Aquatic open water habitat is limited to Hanson Slough, Harkins Slough, Struve Slough, Watsonville Slough, and Chivos Pond. These features, once largely interconnected, are shallow, freshwater, non-tidal sloughs associated with the larger Watsonville Sloughs complex. No other open water habitats including ponds or streams are present within the Study Area.

***Impacts*:** A total of approximately 0.08 acres (approximately 3,500 square feet) of sensitive wetland habitats, including waters of the U.S., would be permanently filled during construction of the project. Those habitat types include are described in more depth below and include 0.01 acres of seasonal wetland, 0.06 acres of freshwater marsh, and 0.01 acres of aquatic habitat. Proposed construction of new trail segments, boardwalk crossings, and viewing platforms would result in minor temporary and permanent impacts to wetlands and associated habitats, including impacts to mixed willow wetlands (discussed above in the sensitive habitats section), palustrine emergent wetland, and aquatic (Hanson Slough).

Boardwalks and wildlife platforms would be designed for construction using driven piles and/or helical anchors, which would avoid excavation and earth moving.

The project would result in 0.01 acres (approximately 435 square feet) of permanent impacts to seasonal wetland situated along the east shore of the West Branch of Harkins Slough. This wetland is adjacent to Boardwalk Crossing B, and would be would be impacted by equipment access, grubbing, vegetation removal, grading and trail construction.

The project would result in 0.06 acres (approximately 2,615 square feet) of permanent impacts to freshwater marsh during construction of Boardwalk Crossing B, the southern viewing platform on Hanson Slough, and road improvements for access to the Cypress Hilltop Picnic Area. For construction of these features, activities such staging, equipment access, construction of temporary access roads, construction of bridge abutments and construction of the boardwalk and bridge approaches may result in temporary disturbances to this habitat type.

Permanent impacts to 0.01 acres (475 square feet) of aquatic habitat of Hanson Slough would result from displacement of this habitat by the piers and deck of Boardwalk Crossing B. Temporary impacts could result from construction, including equipment access, construction of temporary access roads, construction of boardwalk piers and decking. Impacts may also occur from the introduction of sediment or construction materials, potential unanticipated releases of equipment fuel, hydraulic fluid, or other potentially hazardous substances used in construction equipment. No temporary or permanent impacts to Hanson Slough are anticipated as a result of installation of Boardwalk Crossing A. The project includes BMPS that would be implemented during construction to minimize water quality impacts.

Wetlands may be subject to regulation as Waters of the U.S. and/or State by the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB), respectively. The project would require a Section 404 Permit from the USACE, a 1602 Streambed Alteration Agreement from CDFW, a Section 401 Water Quality Certification from the Regional Water Quality Control Board, and a Riparian Exception from the County. Conditions of approval listed in all of these permits must be adhered to, including requirements for compensatory mitigation for impacts to regulated wetlands.

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. Conditions of approval listed in the Riparian Exception must be adhered to. Prior to the approval of any riparian exception, a specific set of findings must be met. The Planning

Department has determined that the project meets the County's findings for a Riparian Exception (SCCC 16.30.060), and Draft Findings are included in Attachment B.

***Mitigation Measures*:** Implementation of Mitigation Measures BIO-2 and BIO-3 (protection of sensitive areas during construction) and Mitigation Measure BIO-18 (sensitive habitat replacement) would reduce significant impacts to a less-than-significant level; see discussion under D-2 above. In addition, implementation of the construction BMPs included as part of the project description would avoid and minimize indirect impacts to wetlands and waters.

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*:** Corridors for wildlife movement (also dispersal corridors, wildlife corridors, or landscape linkages) are features whose primary function is to connect at least two isolated habitat areas. According to the Biotic Assessment prepared for the project (see Attachment B), wildlife that are moving through the Study Area and surroundings are likely to use the sloughs and their riparian habitat as linear corridors because of the shelter, cover, food and water resources these areas provide; however, some species are likely to cross Lee Road, to move between the CDFW Reserve, Chivos Pond and Hanson Slough.

Construction of proposed improvements could interfere with wildlife movement temporarily during construction; however, construction in and near the sloughs is confined to small areas, limited in scale, and of relatively short duration. Minimal impact to wildlife movement is expected from operation of the Program because of the regulated visitor access and overall small-scale nature of the proposed Community Harvest Program. Therefore, the project would not substantially interfere with the movements or migrations of fish or wildlife or impede use of a known wildlife nursery site, resulting in a less-than-significant impact. See D.2 above regarding construction-related impacts and mitigation.

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 is located within a County-defined riparian corridor. See discussions and mitigation measures specified under D-1 and D-2 above. The project must be granted a Riparian Exception in order to be consistent with the County of Santa Cruz Riparian Corridor and Wetlands Protection Ordinance. In order for a project to qualify for a Riparian Exception (SCCC Section 16.30.060), a specific set of findings must be made. The Planning Department has determined that the project meets the County's findings for a Riparian Exception (SCCC 16.30.060), and Draft Findings are included in Attachment B. Therefore, the project is consistent with the County of Santa Cruz Riparian Corridor and Wetlands Protection Ordinance; impacts from project implementation would be less than significant with mitigation incorporated as required by County regulations. The project would not result in removal of significant trees. Therefore, the project would not result in conflicts with local policies or ordinances protecting biological resources, resulting in no impact.

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, as none exist that include the project site. 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 structure(s), including the existing barn that would be demolished, on the property is/are not designated as a historic resource on any federal, state or local inventory. An Extended Phase 1 Cultural Resource Inventory prepared by Albion, dated June 2023, and summarized below under subsection 2 below, included testing that found historic era resources associated with early twentieth-century farming and artifacts from the 1950s and 1960s. The investigation concluded that the proposed project improvement would not result in a significant impact or adverse effect on any historic properties/historical resources, although monitoring during construction was recommended that will be included as a project

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

condition of approval. Therefore, the project would result in a less-than-significant impact to historical resources.

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

***Discussion*:** According to the County's GIS maps, the project site is located within an archaeologically sensitive area. An Extended Phase 1 Cultural Resource Inventory prepared by Albion, dated June 2023, which included: background historical research; review of a previous (2021) records search conducted at the Northwest Information Center (NWIC); a Sacred Lands File search with the Native American Heritage Commission (NAHC) and subsequent outreach to identified Native American groups; 4) a pedestrian field survey of the project; 5) an extended Phase I testing based on results of the survey; and preparation a technical report of findings. there is no evidence of pre-historic cultural resources. Nine additional cultural resources are identified within a half-mile of the project's Area of Potential Effect (APE). The NAHC Sacred Lands file search yielded positive results, and representatives from the local Native American community confirmed that the Project APE and vicinity are sensitive areas for potential cultural resources. The pedestrian survey observed discrete concentrations of American period archaeological materials, and subsequent testing found historic era resources as indicated above, but no intact archaeological deposits were identified. The Cultural Resource Inventory report concluded that the proposed project would not result in a significant impact to archaeological resources, and no further archaeological investigation was recommended.

Due to the area's sensitivity to contain cultural resources, the Cultural Resource Inventory report recommended monitoring during excavation and construction in conjunction with a monitoring plan to be developed in consultation with the local Native American tribes. While this is not a mitigation measure as a significant impact has not been identified, the County has indicated that the recommendation will be included as a project condition of approval.

In addition, pursuant to section 16.40.040 of the SCCC, if at any time in the preparation for or process of excavating or otherwise disturbing the ground, or any artifact or other evidence of a Native American cultural site are discovered, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in SCCC Chapter 16.40.040.

Therefore, the project would result in a less-than-significant impact to archaeological resources.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
3. *Disturb any human remains, including those interred outside of dedicated cemeteries?*	☐	☐	✓	☐

Discussion: Potential impacts to human burials are expected to be less than significant, and the Cultural Resources Inventory did not identify the potential for human burials. 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 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. Therefore, the project would result in a less-than-significant impact regarding disturbance to human remains.

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 Sustainability Update EIR evaluated potential energy demand associated with future estimated residential and non-residential development and provided a quantified estimate of consumption of electricity, natural gas, and petroleum. The EIR found that energy demand would increase as a result of future development accommodated by the Sustainability Update, but future development would be required to comply with the efficiency standards of the California Building Code (CBC) (Title 24 Part 6 and Part 11), and the EIR concluded that additional energy demand as a result of development resulting from the Sustainability Update would not be unusual or wasteful as compared to overall local and regional demand for energy resources. Furthermore, the Sustainability Update EIR indicated that motor vehicles are expected to use decreasing amounts of petroleum over time, primarily due to

advances in fuel economy and the increasing use of electric vehicles. Therefore, the Sustainability Update EIR concluded that electricity, natural gas, and petroleum consumption from future development as a result of the Sustainability Update would not be considered inefficient or wasteful, and impacts would be less than significant.

The project, like all development, would result in an incremental increase in the consumption of energy resources during grading and construction. Construction would entail consumption of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment. It is expected that nonrenewable energy resources would be used efficiently during future construction of the proposed project. The project's permanent operational energy use is also expected to be minimal, and there are no unusual operations that would use energy resources in a wasteful or inefficient manner. The project site plans also indicate that solar roof panels may be added to picnic area at the Cypress Hilltop area. Additionally, the proposed project avoids or reduces inefficient, wasteful and unnecessary consumption of energy. The project would be subject to approval of building permits that meet the CBC and SCCC requirements, as well as compliance with County policies that promote energy conservation and alternative energy sources.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of energy, which concluded that impacts of future development would be less than significant. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, resulting in a less-than-significant impact related to energy use.

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

Discussion: The Sustainability Update EIR reported that Part 6 of Title 24 of the California Code of Regulations establishes energy efficiency standards for residential and non-residential buildings constructed in California to reduce energy demand and consumption. Title 24 also includes Part 11, the California Green Building Standards (CALGreen). CALGreen institutes mandatory minimum environmental performance standards for all

ground-up, new construction of commercial and state-owned buildings. The Sustainability Update EIR found that development facilitated by the Sustainability Update would meet any applicable Title 24 and CALGreen standards to reduce energy demand and increase energy efficiency.

Additionally, as described in the Sustainability Update EIR, Central Coast Community Energy (3CE) started providing clean energy to the county as of 2018. 3CE is on a pathway to 60% clean and renewable energy by 2025 and 100% clean and renewable energy by 2030, as indicated in the EIR. The EIR determined that overall, the county's procurement of energy through 3CE and the projected 100% clean and renewable energy sourcing by 2030 would give customers the option of purchasing this clean energy 15 years ahead of California's SB 100 requirement of zero carbon energy by 2045.

The County also adopted its Climate Action Strategy in 2013 and its Climate Action and Adaption Plan (CAAP) in 2022, which outline the County's course of action to reduce GHG emissions produced by governmental operations and community activities within unincorporated Santa Cruz County, and includes energy-consumption-reduction measures. The County has implemented a variety of strategies from the plan to achieve GHG reductions, efforts which will continue in the future. In addition, the Santa Cruz County Regional Transportation Commission (SCCRTC) 2045 Regional Transportation Plan (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.

The Sustainability Update EIR concluded that, because the land uses to be developed under the Sustainability Update would comply with all applicable energy standards and regulations, and that policies within the Sustainability Update's General Plan/LCP amendments also focus on compact growth, efficient energy use, and renewable energy, the Sustainability Update, and future development would result in a less-than-significant impact associated with the potential to conflict or obstruct a state or local plan for renewable energy or energy efficiency.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of potential conflicts with state or local plans for renewable energy, which concluded that impacts of future development would be less than significant. Therefore, the project would not conflict with or obstruct any state or

local plan for renewable energy or energy efficiency, resulting in a less-than-significant impact related to energy use.

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)*:** The project site is located outside of the limits of the State Alquist-Priolo Special Studies Zone or any County-mapped fault zone (County of Santa Cruz GIS Mapping, California Division of Mines and Geology, 2001). The project site is located approximately 6 mile(s) west of the San Andreas fault zone, and approximately 3.5 mile(s) west of the Zayante fault zone. There is no known potential for ground surface rupture is low based on existing fault mapping, and thus the project would result in no impact related to potential fault rupture.

***Discussion (B through D)*:** All of Santa Cruz County is subject to some hazard from earthquakes, and there are several faults within the County. While the San Andreas fault is larger and considered more active, each fault is capable of generating moderate to severe ground shaking from a major earthquake. Consequently, large earthquakes can be expected in the future. The October 17, 1989 Loma Prieta earthquake (magnitude 7.1) was the second largest earthquake in central California history.

The project site would likely to be subject to strong seismic shaking from earthquakes along the San Andreas fault during the life of the improvements, though the potential for ground surface rupture is low. The new structures would be designed in accordance with the CBC, which should reduce the hazards of seismic shaking and liquefaction.

According to the County's GIS maps, the project improvement sites are located in areas with low liquefaction potential, except for the portion of Hanson Slough on the site that is identified as having a very high potential for liquefaction. There is no development proposed in the slough, except for helical anchors to support the two proposed boardwalks crossing Hanson Slough. These structures are not habitable and would be supported on engineered pile/pier supports, designed in accordance with recommendations of a geotechnical report. According to the County's GIS maps, there are no mapped landslides in the area, and there is no indication that landsliding is a significant hazard at this site.

A geotechnical investigation for the project was performed by Pacific Crest Engineering and summarized in a report dated June 2024 (Attachment C). The report concluded that the potential for ground surface rupture to occur at the site is considered low and that there is a low probability for liquefaction and lateral spreading to occur in areas of proposed improvements. The investigation also found that the potential for shallow landsliding was negligible. The investigation concluded that with incorporation of recommendations in the investigation, the project improvements are feasible from a geotechnical engineering standpoint. The report includes recommendations that will be incorporated into project plans, which address site preparation, excavation, placement of fill, foundation and pavement design, drainage control, erosion control and other general recommendations. Therefore, project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury due to seismic impacts, resulting in a less-than-significant impact.

2. Result in substantial soil erosion or the loss of topsoil?	☐	☐	✓	☐

***Discussion*:** Some potential for erosion exists during the construction phase of the project. Soils on the project consist of Cropley silty clay, Diablo clay, Clear Lake clay, Tierra-Watsonville complex and Watsonville loam, all of which have slight erosion hazards except for Diablo clay soil types that have a moderate to high potential for erosion. Grading would occur at the Gateway area for the new parking lot and barn reconstruction, for the four residential unit (mobile home) pads and for the new driveway off of Harkins Slough Road. However, the potential for erosion is minimal due to the limited area, extent of grading, and that these areas are relatively flat. Areas of grading in all areas would total approximately 2 acres. The project plans indicate that erosion control measures would be provided and

maintained, although specific measures are not yet specified. Project plans also include landscaping and provisions for disturbed areas to be planted with ground cover and to be maintained to minimize surface erosion. Furthermore, the project would not result in uses that would lead to loss of topsoil.

Implementation of standard erosion controls are a required condition of the project pursuant to County regulations; all development, grading and building permits would be reviewed by the County to ensure compliance with the County's Erosion Control Ordinance (Chapter 16.22 of the SCCC). Prior to approval of a grading or building permit, the project also must have an approved stormwater pollution control plan (SCCC Section 7.79.100), which would specify detailed erosion and sedimentation control measures. In addition, for development including ground disturbance of more than one acre, grading and construction would be completed in compliance with the State Water Resources Control Board (SWRCB) Construction General Permit, which would minimize soil erosion and off-site transport of soils through implementation of a required Stormwater Pollution Prevention Plan (SWPPP) and BMPs.

Potential project impacts due to soil erosion or loss of topsoil would be considered less than significant with compliance with County and state regulations and requirements. The Sustainability Update EIR also concluded that, with compliance with County policies and state and local regulations, future development would result in a less-than-significant impact related to soil erosion and loss of topsoil. See also discussion under Section III.F.1 regarding water quality.

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: As indicated, above there are no seismic or geologic hazards present on the project, except for limited areas of potential very high liquefaction potential that are addressed in Section III.G.1 above. None of the proposed structures or trail improvements are located on slopes exceeding 30%. The project site is not located along the coast where coastal bluff erosion or other coastal hazards are present. Following a review of mapped information and a field visit to the site, there is no indication that the development site is subject to a significant potential for damage caused by any of these hazards as none exist, and thus the project would result in no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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: According to County GIS mapping, the majority of the Watsonville Slough Farm, as well as the surrounding area, contain expansive soils. The project geotechnical report concluded that soils underlying the proposed project improvements exhibit intermediate to high expansive potential, and recommendations for foundation design underlain by non-expansive engineered fill are included in the report. The reconstructed barn and other structural improvements would be designed in accordance with findings and recommendations of a geotechnical report, which is required by county and state regulations. Thus, the project would be designed to prevent substantial risks to life or property, resulting in a less-than-significant impact.

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 upgraded existing and new onsite wastewater treatment systems (OWTSs) to serve the Gateway, the Farmworker "A" and Cypress Hilltop areas. A soil feasibility study was conducted in accordance with County requirements and found that soils were adequate to support OWTSs at all sites, although enhanced treatment was recommended for the site with two new farmworker units (Fox Onsite Solutions). County Environmental Health Services has determined that site conditions are appropriate to support such a system (Attachment D).

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 site. A query was conducted of the mapping of identified geologic/paleontological resources maintained as part of the County of Santa Cruz Planning Department GIS system, there are no records of paleontological or geological resources in the vicinity of the project parcel. Therefore, no direct or indirect impacts are anticipated.

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

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 result in an incremental increase in greenhouse gas (GHG) emissions due to use of fossil fuels during the site grading and construction. In February 2013, the County Board of Supervisors approved the County's Climate Action Strategy (CAS) which includes targets for GHG reduction from the transportation, energy, and solid waste sectors, outlines strategies and implementing actions to achieve the targets, and provides a vulnerability assessment and eight climate adaptation goals intended to reduce vulnerability to climate change. In 2022, the County adopted an updated Climate Action and Adaption Plan (CAAP) that provides actionable steps towards reducing GHG emissions, adapting to climate hazards, and ensuring the safety and well-being of those most vulnerable to climate change.

The EIR included an estimate of operational GHG emissions that would be generated by future development accommodated by the Sustainability Update from area, energy, mobile, waste, and water sources. While GHG emissions from area, energy, waste, and water sources would be higher under the Sustainability Update relative to existing (2019) conditions, GHG emissions from mobile sources would be lower under the Sustainability Update than existing conditions due to cleaner on-road mobile sources in the future. As a result of the reduction in mobile source emissions, the EIR found that overall GHG emissions generated by the Sustainability Update in 2040 would be approximately 195,109 MT CO_2e per year less than existing (2019) conditions, and the EIR concluded that future development would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment, resulting in a less-than-significant impact related to the generation of GHG emissions.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of GHG emissions, which concluded the impact would be less than significant. Therefore, the project would not result in generation of significant GHG emissions and would result a less-than-significant impact.

	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: The Sustainability Update EIR included an analysis of potential conflicts with relevant plans that include GHG reduction strategies, including the County of Santa Cruz CAS, AMBAG's 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and CARB's Scoping Plan. The EIR found that development accommodated by the Sustainability Update would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable, and concluded that potential conflicts with applicable GHG reduction plans would result in a less-than-significant impact.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of potential conflicts with GHG reduction plans, which concluded the impact would be less than significant. Therefore, the project would result a less-than-significant impact. See also the discussion under H-1 above.

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 may be used in minor quantities for construction equipment, but would occur within the limits of the construction staging area. BMPs proposed as part of the project would be used to ensure that no impacts would occur during construction and use of equipment fueling. Therefore, the project would not create a significant hazard, resulting in a less-than-significant impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
2. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*	☐	☐	✓	☐

Discussion: 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: The Pajaro Valley High School is located at 500 Harkins Slough Road, approximately 0.5 miles north of the Gateway project area. Active agricultural production is located in the area between the project site at the Gateway entrance and the high school site. Although fueling of equipment is likely to occur within designated staging areas, BMPs to contain spills would be implemented. Therefore, the project would result in no impact related hazardous emissions or handling hazardous materials within one-quarter mile of a school.

4. *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*	☐	☐	☐	✓

Discussion: The project site is not included on the list of hazardous sites in Santa Cruz County compiled pursuant to Government Code section 65962.5 (California Environmental Protection Agency (CalEPA). 2023). Two of the Watsonville Slough Farm parcels (052-081-34 and -35) appear as part of former farm Notice of Intents provided as part of the State Water Board's Irrigated Lands Regulatory Program, but all have been terminated.

A Phase I Environmental Site Assessment (ESA) was conducted for most of the project site in 2008 and revealed no evidence of Historical Recognized Environmental Conditions or Recognized Environmental Conditions in connection with the property, except for the likely historic storage and use of pesticides and the likely historical use of cattle insecticide during farming, grazing, ranching and breeding operations from 1931 to 1995 and farm equipment storage, repair and fuel storage (Environmental Investigation Services, Inc. May 2008). The Phase I ESA also recommended that prior to demolition or renovation of onsite structures, an

asbestos and lead paint inspection be conducted for existing structures and that abandoned fuel storage tanks and asbestos irrigation piping be disposed of at an appropriate landfill according to state and federal regulations.

A subsequent Phase II ESA was conducted, which consisted of soils and groundwater sampling and testing (Environmental Investigation Services, Inc. December 2008). The results indicated no evidence of soil or shallow surface impact by petroleum hydrocarbons, pesticides, VOCs, or the metals copper and lead from past site usage except for elevated levels of the pesticide DDT and the metal lead in two soil samples. The investigation recommended excavation and offsite disposal of soils in these locations to reduce the level of DDT and lead concentrations in shallow soils.

The Phase II ESA also found that although the concentrations of arsenic in soil samples were above state screening levels, the levels are consistent with background levels found in Santa Cruz County and not considered a concern of the site. It was also recommended that water from the domestic well should not be used as potable water unless treated by chlorinating and filtering to remove nitrates and coliform (Environmental Investigation Services, Inc. December 2008).

The impacted soils were subsequently removed, and it was determined that the soil remedial action had successfully removed the lead impacted soils from identified locations (Environmental Investigation Services, Inc. May 2009).

A shallow soil assessment consisting of soils borings and testing, was conducted in 2024 in the proposed Gateway portion of the project to assess potential environmental impacts not addressed in previous assessments conducted in 2008. The investigation concluded that the results of the soil screening assessment coupled with the previous 2008 soil assessment and limited soil remediation confirm that the environmental quality of site soils resulting from historic land use activities have not been adversely impacted (WHA April 2024).Therefore, previous investigations and remediation efforts do not reveal the potential for release or exposure to hazardous materials. Testing for asbestos and lead in existing structures will be conducted in accordance with applicable state and federal regulations prior to demolition of existing structures. Thus, no impacts are anticipated as a result of project implementation.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*	☐	☐	✓	☐

Discussion: The project site is located approximately one mile southwest of the Watsonville Municipal Airport. According to the County's GIS maps and Appendix H of the County General Plan, which was adopted as part of the recent Sustainability Update, only the northern edge of the Watsonville Slough Farm property is located in the mapped outer traffic pattern zone of the Airport. Neither the property nor project sites are located within an airport safety zone. Additionally, only the northernmost portion of the Farm is located within the 55 decibel (db) CNEL noise contour zone, but all of the project sites are located outside the 55 db CNEL. While project residents, workers and visitors would be exposed to intermittent aircraft noise, the project sites are located within areas that are below the noise levels found acceptable for residential use. Therefore, the project would not result in people residing or working in the project areas to be exposed to excessive airport noise. Furthermore, the proposed reconstructed barn would not exceed the basic height limit applicable to the underlying zone district, and, therefore, pursuant to SCCC 13.12.050, the structure would not represent an airspace obstruction. Therefore, the project would not result a safety hazard for people residing or working in the project area or expose people to excessive airport noise, resulting in a less-than-significant impact.

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

Discussion: the Santa Cruz County Office of Response, Recovery & Resilience (OR3) serves as the emergency management office for responding to ongoing disasters. Evacuations are frequently a response to natural disasters to protect people from potential harm. The County uses a variety of methods to notify residents when an evacuation is necessary, including reverse 911 calls, text or phone messages through Code Red (for those who have signed up), and/or door-to-door notifications. Evacuation areas are determined by the incident command team, who are in charge of responding to the disaster (County of Santa Cruz 2022).

The proposed project would not include any changes to existing public roadways that provide emergency access to the site, except access into the project site from Lee Road and Harkins

Slough Road would be improved. In addition, 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, the project would not impair implementation of or physically interfere with an emergency response or evaluation plan, resulting in no impact.

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

Discussion: According to the County's GIS maps, the project site is not located within a fire hazard area, except for the far western edge of the Watsonville Slough Farm in an area that is not proposed for new development. The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impact would occur. See also discussion under Wildfire Question T-2.

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 would not result in discharges either directly or indirectly that would violate water quality standards. Increased runoff as a result of the project would be limited. Impervious surfaces would be limited to the new and expanded barn and four small residential units. Proposed paving includes pervious concrete for the new parking lot in the Gateway area, and asphalt and gravel surfacing for several other existing onsite roads that lead to project areas. Runoff from these areas would incrementally contribute urban pollutants from motor vehicles carried in runoff. However, the contribution would be small, given the size of the parking area and improved onsite road segments, and project plans include biofiltration systems adjacent to improved onsite driveways. No commercial or industrial activities are proposed that would contribute contaminants.

The project is located adjacent to Harkins, Hanson and Struve Sloughs and has the potential to generate water quality impacts during construction due to potential erosion. An erosion control plan is required per section 16.22.060 of the SCCC. With implementation of erosion control plans as required by County regulations and state requirements and for a SWPPP,

potential erosion impacts would be mitigated to a less-than-significant level as discussed in Section III.G.2.

In addition to project-proposed BMPs, the following water quality protection and erosion and sediment control BMPs will be implemented, based on standard County requirements, to minimize construction-related erosion and sedimentation of Harkins, Hanson and Struve Sloughs. 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 April 15 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 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 in accordance with County and state regulations and requirements would ensure that potential water quality impacts to Harkins, Hanson and Struve Sloughs would be less than significant. Thus, no water quality standards or waste discharge requirements would be violated and surface or ground water quality would not otherwise be substantially degraded. The project would result in a less-than-significant impact regarding water quality.

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 Watsonville Slough Farm currently utilizes four onsite wells for agricultural irrigation water. The wells would also provide the water source for the proposed water storage tank that would be installed for fire suppression purposes. An Individual Water System is proposed to be developed to provide potable water to serve the proposed farmworker housing units and offices, utilizing existing and/or new onsite wells. Prior to development of the farmworker units or occupancy of the barn, an application for an individual water system permit shall be made to the County Health Officer in accordance with the requirements of the Santa Cruz County Code Chapter 7.73. As part of the permit application process, the Land Trust will contract with a California-licensed well driller, pumping contractor to provide a Water Yield Report demonstrating that water yield meets requirements as specified in SCCC 7.73.050. In addition, the Land Trust will submit to the Health Officer the required reports of bacteriological analysis and chemical analysis performed by a laboratory certified by the State Department of Health Services. Water would not be provided to other visitors, except bottled water would be provided for special events.

The project site is located within the Pajaro Valley Groundwater Subbasin, which is as a primary source of water for urban and agricultural land uses in the southern portion of the county. As reported in the Sustainability Update EIR, the Pajaro Valley Subbasin is considered a high priority basin by the state of California and must adhere to the requirements of Sustainable Groundwater Management Act by preparing and implementing a groundwater sustainability plan (GSP). The Pajaro Valley Subbasin is designated as "critically overdrafted," resulting in an accelerated timeline for SGMA implementation. The Groundwater Sustainability Agency set up for each basin pursuant to state law are implementing plans to reach sustainable groundwater levels in the next 20 years and have made progress in meeting sustainable groundwater management goals as summarized below for each basin.

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

The Sustainability Update EIR found that future development and redevelopment would result in additional demands for potable water supplies that are provided by groundwater resources in in the Pajaro Valley Subbasin, which is experiencing seawater intrusion and also is in an overdraft condition. However, the EIR concluded that with the continued implementation of the 2014 Basin Management Plan by the Pajaro Valley Water Management Agency (PV Water), the impacts of future increased water demands would be less than significant.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of groundwater impacts, which concluded the impact would be less than significant. Therefore, the project would not substantially decrease groundwater supplies and would result a less-than-significant impact.

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

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 would not alter the course of any stream or river. The project would result limited areas of increased impervious surfaces and runoff. Runoff from paved surfaces would be directed to biofiltration planters or swales. A grading and drainage concept plan was prepared as part of the project plan. The County Department of Public Works Stormwater Management Section staff has reviewed and approved the proposed drainage plan. The Project would 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, resulting in a less-than-significant impact.

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

Discussion: According to the Federal Emergency Management Agency (FEMA) National Flood Insurance Rate Map, dated May 16, 2012, no portion of the project site lies within a flood hazard zone, except for Hanson Slough, but no development or improvements are proposed in this area.

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. 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. 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 approximately 1.5 miles inland from the coast, and is approximately one mile beyond the effects of a tsunami according to County's GIS maps. The project site is not located adjacent to a lake or body of water and would not be affected by a seiche.

Therefore, the project would not result in potential release of pollutants as a result of inundation from flooding, tsunami or seiche, resulting in no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
5. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*	☐	☐	☐	✓

Discussion: The Sustainability Update EIR reported that future development projects would be required to adhere to any applicable waste discharge and other regulatory requirement, and therefore, would be consistent with goals of the Central Coast Basin Plan for water quality and would not conflict or obstruct implementation of the water quality control plan for the region. As indicated in I.1 above, the project would not result in significant water quality impacts, and thus, would not obstruct implementation of a water quality control plan, resulting in no impact.

The project site is located within the Pajaro Valley Groundwater Subbasin, which provides the primary source of water for urban and agricultural land uses. The Pajaro Valley Subbasin is designated as "critically overdrafted" and also subject to seawater intrusion (County of Santa Cruz 2022). The Pajaro Valley Water Management Agency (PV Water) is the Groundwater Sustainability Agency (GSA) for the Subbasin and responsible for achieving groundwater sustainability for the Subbasin by 2040. As discussed in Question J-2, the project proposes to develop an Individual Water System to provide potable water to serve the proposed farmworker housing units and offices, utilizing existing and/or new onsite wells, which would be subject to County review and approval. Water would not be provided to other visitors, except bottled water would be provided for special events. The amount of development proposed by the project is within the amount of development analyzed in the Sustainability Update EIR for which a less-than-significant impact related to groundwater impacts and no impact related to conflicts with sustainable groundwater management plans were identified. Therefore, the project would not result in conflicts with the Groundwater Sustainability Update 2, which serves as the sustainable groundwater management plan for the basin, resulting in no impact. See Question J.2 for further discussion.

K. Land Use and Planning

Would the project:

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

Discussion: The project is located in a rural agricultural area and does not include any element that would physically divide an established community. No impact would occur.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 ARC-3.3.3 (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". As discussed under Question D-5, the Planning Department has determined that the project meets the County's findings for a Riparian Exception. Therefore, the project would not result in a significant impact due to conflicts with a plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect, resulting in no impact.

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: According to the County's GIS mapping, the site does not contain any known mineral resources that would be of value to the region and the residents of the state. Therefore, the project would not result in loss of a known mineral resource, resulting in no impact.

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 Commercial Agriculture with an Airport overlay district (CA-AIA), which is not considered to be an Extractive Use Zone (M-3) nor does it have a Quarry Designation Overlay (Q) land use designation. 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.

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

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?*	☐	☐	✓	☐

Discussion: The project would result in a temporary increase in noise levels during construction, but there are no sensitive receptors in the vicinity of proposed new structures and improvements. Construction would be temporary, and construction noise levels would vary throughout a given day, depending on the construction activity that is occurring.

The County of Santa Cruz has not adopted noise thresholds for construction noise, but the County General Plan/LCP Noise Element requires Policy 9.2.6 requires mitigation and/or BMPs to reduce construction noise as a condition of project approvals, particularly if noise levels would exceed 75 dB at neighboring sensitive land uses or if construction would occur for more than 7 days. Chapter 13.15 of the SCCC also regulates noise generation and noise exposures and specifically exempts construction noise from the requirements of the ordinance provided the activity takes place during specified construction hours. Construction hours would be limited per the County noise ordinance. Since there are no adjacent sensitive receptors, and given the limited duration of construction and the limited hours of construction activity, temporary noise increases resulting from project construction would be considered to be less than significant.

The project would not result in a substantial permanent increase in the ambient noise level as a result of visitors to the Community Harvest Program. Impacts are expected to be less than significant.

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

Discussion: The use of construction and grading equipment could potentially generate limited, temporary, periodic vibration during construction where new structures and improvements are planned. Potential generation of construction-related vibration would be temporary and periodic, and the level of vibration that could occur, if any, therefore would be minor and would not be considered excessive that would cause damage or disturbances. Thus, the project would not result in generation of excessive vibration, resulting in a less-than-significant impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 within one mile, but would not expose people to excessive noise levels as explained above in question I.5.

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 result in construction of four housing units for a caretaker and farmworkers who already reside in the area, which would result in a net increase of two onsite housing units as two units would replace two units previously on the site. Thus, the project would not directly induce substantial unplanned population growth in the area. The project also would not indirectly 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: 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 annexation actions approved by the Local Agency Formation Commission (LAFCO) of Santa Cruz County. Therefore, the project would not result in direct or indirect substantial population growth, resulting in 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.

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

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-b)*:** The project would be served by County Service Area (CSA) 48, Santa Cruz County Fire, and CAL FIRE for fire protection, the County Sheriff's Office for police protection, the Pajaro Valley Unified School District for schools and County of Santa Cruz for parks. The project would result in four housing units for a caretaker and onsite farmworkers, and visitation resulting from the proposed Community Harvest Program would be managed. Therefore, potential increased demands for police and fire protection services would minimal. The project will also be required to meet all of the applicable standards and requirements of Santa Cruz County Fire or CAL FIRE.

The Sustainability Update EIR, which evaluated impacts associated with fire protection and police protection services, concluded that the population growth and new development resulting from the Sustainability Update would result in increased demand services throughout the county. However, the Sustainability Update EIR found that future growth would not result in the need for additional fire protection or police protection facilities in order to maintain acceptable service ratios and response times in the future.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the

Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the Sustainability EIR (as discussed above) for the review of impacts to fire and police protection services, which concluded the impact would be less than significant. Therefore, the project would not require construction of new facilities as a result of public service demands, resulting a less-than-significant impact.

***Discussion (c-e)*:** The proposed housing would be for workers currently residing in the area, and thus, would not result in increased demands for schools, parks or other services. Therefore, the project would result in no impact related to these services.

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. As indicated above, the proposed housing would be for workers currently residing in the area, and thus, would not result in increased demands for parks. Therefore, the project would result in no impact.

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*:** The proposed project would not conflict with a program, ordinance or policy addressing the circulation system within the vicinity, including transit, roadway, bicycle and pedestrian facilities. There would be no operational changes to the vehicle circulation system, and the project includes opening up trails for public use as part of the proposed Community Harvest Project. The new entrances to the site would comply with County regulations under section 13.11.074 of the SCCC. The project would create a small incremental increase in traffic on nearby roads and intersections of approximately 125 daily trips with approximately 12 peak hour trips. The increase would not cause the level of service (LOS) at any nearby intersection to drop below County goals set forth in the General Plan Policy AM-6.2.1. Therefore, the project would not conflict with a plan, ordinance or policy addressing the circulation system in the area, resulting in no impact.

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 the California Office of Planning and Research (OPR) in 2018 provides recommended thresholds and methodologies for assessing impacts of new developments on VMT.

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.

The County's VMT Guidelines (Santa Cruz County 2020) provide details on appropriate screening criteria that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant impact on VMT without conducting a more detailed analysis. The screening criteria are based on the California Governor's Office of Planning and Research (OPR's) Technical Advisory (OPR 2018). A land use project need only to meet one of the below screening thresholds to have a presumption of less-than significance.

A review of the project and VMT was conducted (Dudek 2024) and is included in Attachment E. The project contains a mix of uses (e.g., residential, office, and agriculturally-related public

use). Per the County's Guidelines, if there are multiple distinct land uses within the project (residential, office, retail, etc.), they are required to be analyzed separately unless they are determined to be insignificant to the total VMT. Trip generation was estimated for each of the proposed project uses to determine whether the project qualifies under the screening for "small projects" with no more than 110 daily trips. The review found that the residential and office uses would each result in daily trips substantially less than the screening threshold of 110 net new daily trips. The proposed Community Harvest Program could result in up to 110 daily trips, when accounting for daily visitation, and planned special events would result in average daily trips below the 110 trips screening level. Therefore, all project uses would be less than the screening threshold of 110 net new trips, and thus, the project VMT impact is considered a less-than-significant impact, and the project would not conflict with CEQA Guidelines section 15064.3(b)(1) regarding VMT (Dudek 2024).

Per the County's guidelines, if a project is a local serving retail use of 50,000 square feet or less and is considered by the County to be local serving, the project is screened from conducting a VMT analysis. This is based on the Technical Advisory that advises that because local serving retail uses tend to improve retail destination proximity, shorten trips, and reduce VMT, they may be presumed to have less than significant impacts. Although not a retail use, the proposed Community Harvest Program is intended to primarily serve local residents in south county. Furthermore, the existing barn would be demolished and rebuilt as an approximately 9,500 square foot multi-purpose barn and would not exceed a total of 50,000 square feet. The project would meet the County's screening criteria for the size of a local serving use (Dudek 2024).

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 proposed project does not include improvements to existing roads, but does include improvements to the property entrances off of Lee Road and Harkins Slough Road, which have been designed in accordance with standard County requirements. The entrance improvements would not result in designs that would substantially increase hazards. Thus, the proposed project would not result in increased hazards related to project design, resulting in no impact.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Result in inadequate emergency access?	☐	☐	☐	✓

Discussion: The project is designed in accordance with recommendations of Santa Cruz Fire and CAL FIRE requirements and would provide for adequate emergency access, resulting in no impact.

R. Tribal Cultural Resources

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

As described above in Section E.5, Cultural Resources, no potential archaeological resources were identified on the project site, and no tribal cultural resources are known. Furthermore, General Plan/LCP Policy ARC-8.1.5 and SCCC Chapter 16.40 set forth the procedure to follow in the event that unknown archaeological materials, which could include tribal

cultural resources, are unearthed during construction, as described in Section IV.E.5 above, and implementation of these standards would be a standard condition of approval. Therefore, the project would result in no impact to the significance of a Tribal Cultural Resource.

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: The is not served by public water, wastewater collection, wastewater treatment or storm drainage facilities, and thus, no new facilities are required to serve the project. Pacific Gas and Electric Company (PG&E) provides electrical power to existing and new developments in the Santa Cruz County area. Private companies provide a variety of telecommunications services in the County. The proposed site is already provided electrical service, and a number of telecommunications options are available to the site, and no further improvements to serve the site are necessary. Therefore, the project would not require relocation or construction of new infrastructure facilities identified above, resulting in 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 project is not served by a public or private water utility. As discussed under Question J.2. above, an Individual Water System is proposed to be developed to provide potable water to serve the proposed farmworker housing units and offices, utilizing existing and/or new onsite wells. Prior to development of the farmworker units or occupancy of the barn, an application

for an individual water system permit shall be made to the County Health Officer in accordance with the requirements of the Santa Cruz County Code Chapter 7.73. As part of the permit application process, the Land Trust will contract with a California-licensed well driller, pumping contractor to provide a Water Yield Report demonstrating that water yield meets requirements as specified in SCCC 7.73.050. In addition, the Land Trust will submit to the Health Officer the required reports of bacteriological analysis and chemical analysis performed by a laboratory certified by the State Department of Health Services. Thus, project compliance with County regulations would ensure that adequate water supply and quality would be provided. Water would not be provided to other visitors, except bottled water would be provided for special events.

3. *Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*	☐	☐	☐	✓

Discussion: No wastewater would be connected to the municipal sewer collection system during construction of the project. No wastewater would be generated during the operational phase of the project. 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: The proposed project is expected to result in a small incremental increase in solid waste due to the limited residential and office uses and nature of the public visitation. The Sustainability Update EIR, which evaluated impacts regarding with solid waste disposal, concluded that adequate landfill capacity is available to serve development accommodated by the Sustainability Update and beyond, and concluded that that impacts related to generation of solid waste as a result of future development would be less than significant.

As indicated above in the Use of Earlier Analyses subsection to Section III, the proposed residential structures for a caretaker and three onsite farmworkers and non-residential structures that would be constructed to support the proposed Community Harvest Program and offices for local non-profit organizations affiliated with the Watsonville Slough Farm, are within the overall amount of future development evaluated at a program level in the Sustainability Update EIR. This Initial Study tiers off and incorporates by reference the

Sustainability EIR (as discussed above) for the review of impacts related to generation of solid waste, which concluded the impact would be less than significant. Therefore, the project would not result in generation of solid waste in excess of landfill capacity and would result a less-than-significant impact.

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?*	☐	☐	☐	✓

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 would not impair implementation of emergency response or evacuation plans as discussed above in Question I.6. 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. The project includes minimal habitable structures, and the proposed design incorporates all applicable fire safety code requirements and includes fire protection devices as required by the local fire agency. Therefore, construction and operation of the project is not expected to exacerbate wildfire risks, resulting in a less-than-significant impact.

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: As indicated above, 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. The project includes installation of a new 120,000-gallon water storage tank for fire suppression. The project does not include installation or new infrastructure or maintenance of existing roads that could exacerbate fire risk, resulting in no impact.

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.

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 Questions D and E above. Potentially significant impacts

have been identified related to special status species, riparian and sensitive habitats and wetlands. However, mitigation has been included that clearly reduces these effects to a level below significance. As a result of this evaluation, there is no substantial evidence that, after mitigation, 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. There are no other known cumulative projects that would result in impacts to which the proposed project would contribute. Therefore, no cumulative impacts have been identified. 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, including air emissions, noise or hazards due to location near an airport. construction noise and vibration. Thus, no environmental effects have been identified that would have direct or indirect adverse effects on human beings. As a result of this evaluation, no potentially adverse effects to human beings associated with this project were identified. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

IV. REFERENCES USED IN THE COMPLETION OF THIS INITIAL STUDY

Albion. 2023. Extended Phase I Cultural Resource Inventory for the Watsonville Slough Farms Project, Santa Cruz County, California. June 2023.

AMBAG.

a. Adopted June 15, 2022. "2022 Regional Growth Forecast."
b. Adopted June 11, 2014. "2014 Regional Growth Forecast".

California Department of Conservation. 2023. Santa Cruz County Important Farmland 2020. Farmland Mapping and Monitoring Program. Published 2023.

California Environmental Protection Agency (CalEPA). 2023. Cortese List Data Resources. Accessed June 24, 2024, 2023 at https://calepa.ca.gov/SiteCleanup/CorteseList/.

California Office of Planning and Research (OPR). 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." Available online at http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

County of Santa Cruz

a. 2024. Geographic Information Services maps. Available online at: https://www.santacruzcountyca.gov/Departments/GeographicInformationSystems(GIS).aspx.
b. Adopted December 13, 2022. *Sustainability Policy and Regulatory Update*. Available online at: https://sustainability-update-sccgis.opendata.arcgis.com/pages/documents.
c. August 2022. Environmental Impact Report, County of Santa Cruz Sustainability Policy and Regulation Update (SCH# 2020079005), which consists of the Draft EIR volume (April 2022) and the Final EIR volume (August 2022). Prepared by County of Santa Cruz Community Development and Infrastructure Department with assistance of Dudek. Available online at: https://www.sccoplanning.com/PlanningHome/Environmental/CEQAInitialStudiesEIRs/ArchivedCEQADocuments.aspx.

Dudek. 2024. Watsonville Slough Farm Community Harvest Project: Transportation Assessment. July 10, 2024.

Ecosystems West Consulting Group. 2024. Biotic Assessment for the Proposed Community Harvest Program at Watsonville Slough Farm Santa Cruz County, CA. May 2023 (Updated February 2024)

Environmental Investigation Services, Inc.

a. May 5, 2008. Phase I Environmental Site Assessment, Tai Property, 275 Lee Road, Watsonville (APN 052-081-35 & 052-081-37). Prepared for Land Trust of Santa Cruz County.
b. December 31, 2008. Phase II Investigation Report, 275 Lee Road, Watsonville, California, EIS Project #816-2.
c. May 2009. Limited Soil Remedial Action Report, 275 Lee Road, Watsonville, California, EIS Project #816-4

FEMA, 2012

Flood Insurance Rate Map Panels 06087C0391E & 06087C0393E Federal Emergency Management Agency. Effective on May 16, 2012.

Fox Onsite Solutions. Undated. Santa Cruz County Onsite Wastewater Treatment System Soil Feasibility Study, APN 052-081-37, 275 Lee Road, Watsonville, CA.

Monterey Bay Air Resources District[4] (MBARD). 2008. CEQA Air Quality Guidelines. Prepared by the MBUAPCD, Adopted October 1995, Revised: February 1997, August 1998, December 1999, September 2000, September 2002, June 2004 and February 2008.

Pacific Crest Engineering, Inc. 2024. Geotechnical Investigation Watsonville Slough Farm Community Harvest Project, Watsonville, California. June 2024.

WHA, Weber, Hayes & Associates. April 3, 2024. Phase II Shallow Soil Screening Data Gap Assessment. Prepared for Land Trust of Santa Cruz County.

[4] Formerly the Monterey Bay Unified Air Pollution Control District.