

San Lorenzo Valley Unified School District



San Lorenzo Valley High School Fields Project Draft Initial Study

Submitted by

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Section 1.0 Introduction and Purpose

1.1 Purpose of the Initial Study

The San Lorenzo Valley Unified School District (the District), acting as the Lead Agency, has prepared this Initial Study for the San Lorenzo Valley High School Fields Project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the County of Santa Cruz, California.

The project proposes the installation of field lights and an upgraded public address (PA) system, the construction of a restroom and a snack shack, the replacement of aging bleachers, and construction of two press boxes on the football, baseball, and softball fields of the San Lorenzo Valley High School campus (SLV campus). This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 Public Review Period

Publication of this Initial Study marks the beginning of a 20-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 20-day public review period should be sent to:

Chris Schiermeyer
District Superintendent
San Lorenzo Valley Unified School District
325 Marion Ave.
Ben Lomond, CA 95005
cschiermeyer@slvusd.org

1.3 Consideration of the Initial Study and Project

Following the conclusion of the public review period, the District will consider the adoption of the Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled meeting. The District shall consider the Initial Study/MND together with any comments received during the public review process. Upon adoption of the MND, the District may proceed with project approval actions.

1.4 Notice of Determination

If the project is approved, the District will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for

30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

Section 2.0 Project Information

2.1 Project Title

San Lorenzo Valley High School Fields Project

2.2 Lead Agency Contact

Chris Schiermeyer
District Superintendent
San Lorenzo Valley Unified School District
325 Marion Ave.
Ben Lomond, CA 95005
cschiermeyer@slvusd.org

2.3 Project Proponent

San Lorenzo Valley Unified School District

2.4 Project Location

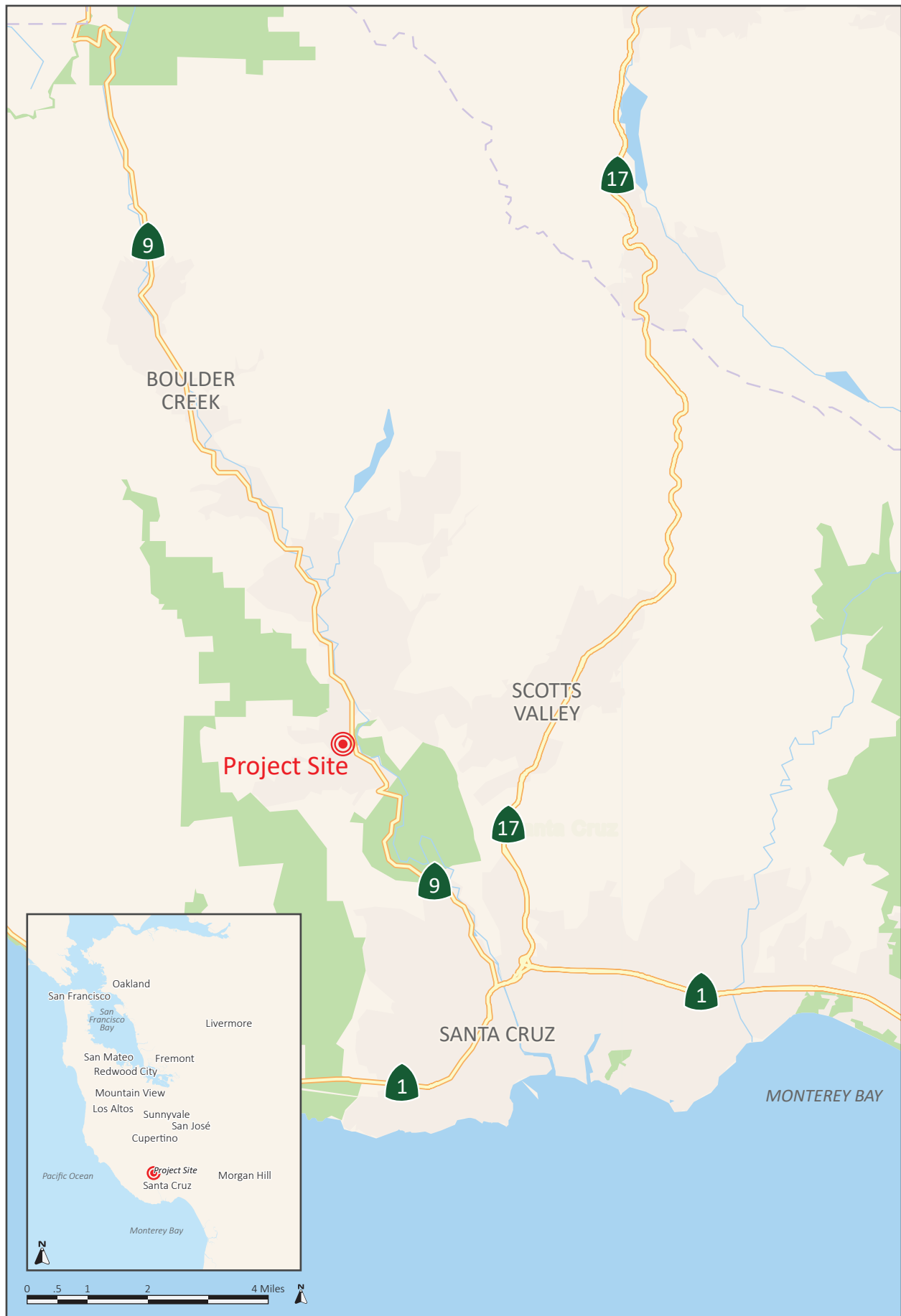
The San Lorenzo Valley Tri-Campus (SLV) campus is located at 7105 State Route 9 (Highway 9) in the Town of Felton. The project site consists of the existing football field, two softball fields, and one baseball field. A regional map and vicinity map of the site are shown on Figure 2.4-1 and Figure 2.4-2, respectively. An aerial photograph of the site and surrounding land uses is shown on Figure 2.4-3.

2.5 Assessor's Parcel Number

071-15-124

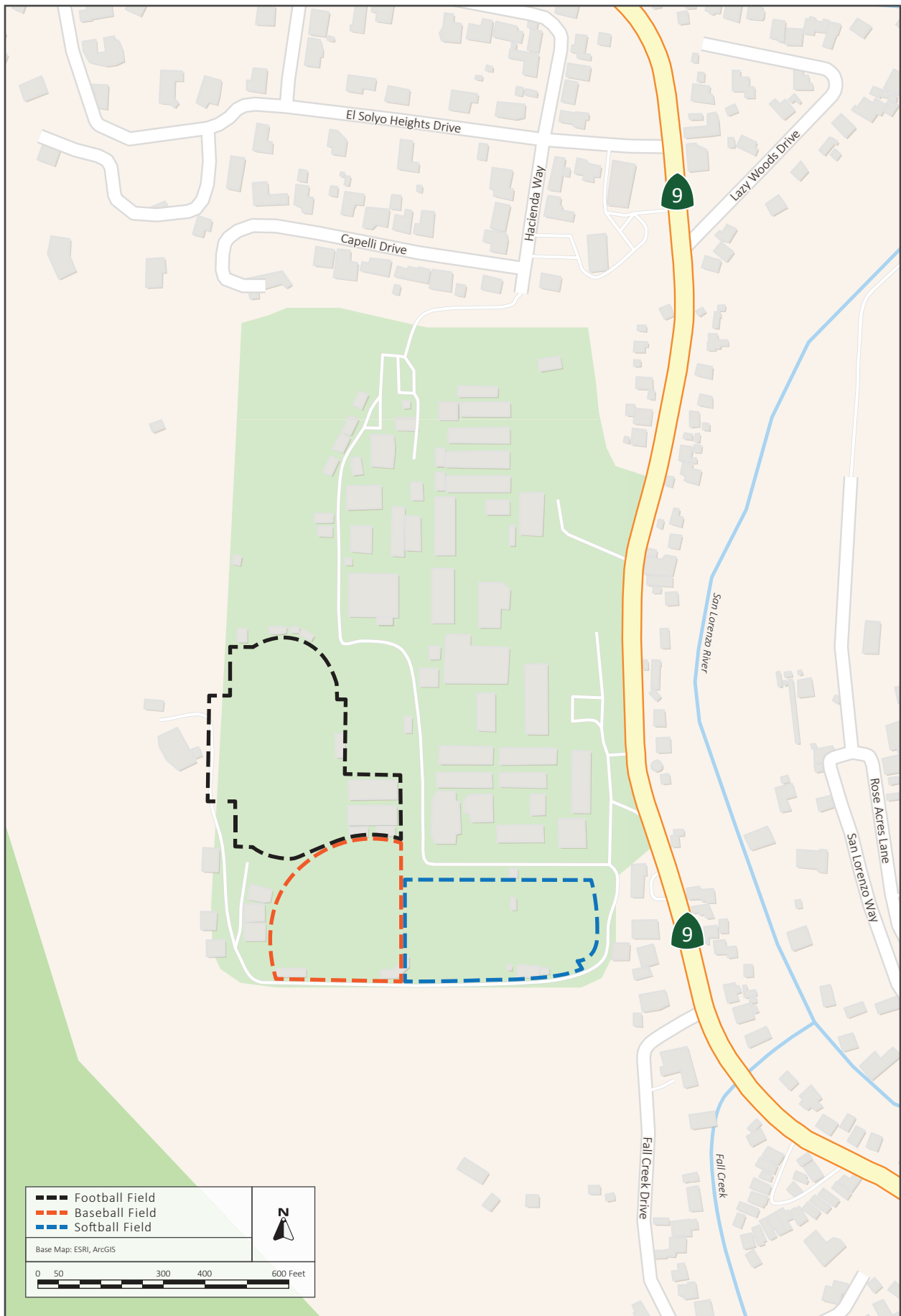
2.6 General Plan Designation and Zoning District

County General Plan Land Use Designation: Public Facility/Institutional (P).
County Zoning: Public and Community Facilities (PF)



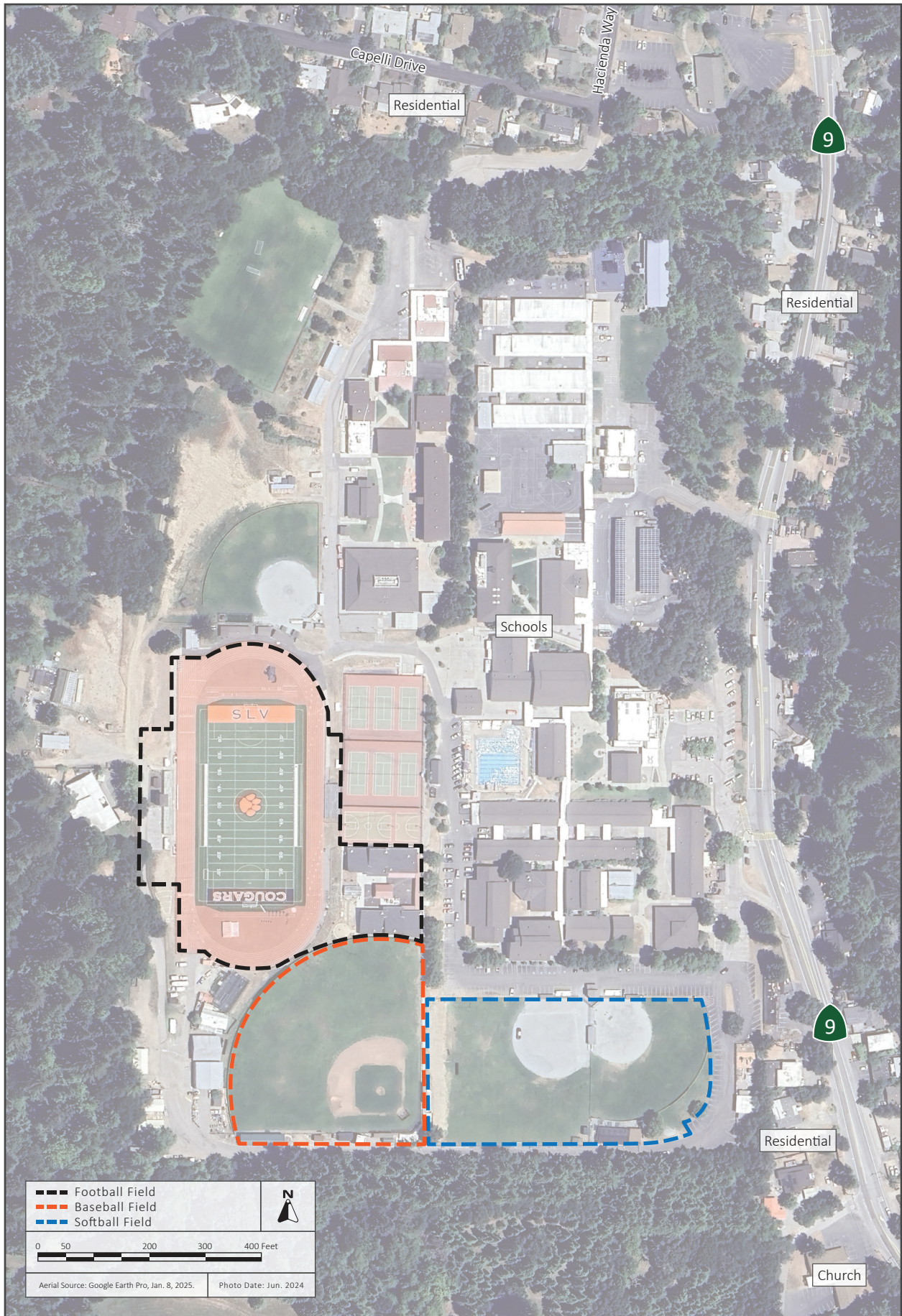
REGIONAL MAP

FIGURE 2.4-1



VICINITY MAP

FIGURE 2.4-2



AERIAL MAP

FIGURE 2.4-3

Section 3.0 Project Description

3.1 Project Description

The project would include the installation and operation of field lights and an upgraded PA system at the SLV football, softball, and baseball fields. Additionally, the project would replace the aging bleachers for all three fields, demolish the existing restroom and snack shack to construct a new restroom and snack shack between the softball and baseball fields, and construct two press boxes attached to the softball and baseball bleachers. The field lights would provide safe and flexible nighttime use of the fields for various sporting and marching band activities, including practices and games. The field lights would also allow for evening special events, such as commencement exercises. A select number of nighttime events would include the use of the PA system. The PA system will also be used for sporting events, marching band, and school activities during daytime hours.

3.1.1 Existing Development

The project site is part of the SLV campus and consists of three athletic fields: the football, softball, and baseball fields. The fields are located around the outer perimeter of the SLV campus starting at the southernmost side of the campus and wrapping around the west side of the campus.

The football field consists of a rubberized track, turf athletic field, two sets of metal bleachers capable of seating 1070 attendees on the eastern and western sides of the track, and portable storage/restroom buildings along the perimeter of the track. The home bleachers on the western side of the track have an attached press box which extends approximately twenty feet above the top of the bleachers. The press box includes three loudspeakers.

The varsity baseball field consists of a grass outfield, clay/gravel/grass infield, and a pitchers' mound. There is a single set of bleachers behind the backstop and dugouts on the southeast end of the field. Next to the bleachers are restrooms, snack bar, lockers, an announcer's tower with speakers and a covered bullpen on the south/west corner outside of the third base line.

The junior varsity (JV) softball field is the westernmost softball field and is a grass field that also hosts soccer and football practices along with youth softball, little league and soccer events outside of school hours. This softball field has a gray gravel infield and grass outfield with a backstop on the northeast corner of the field. There is one set of bleachers capable of seating 40 attendees along the northern fence line along with a dugout. The second dugout is on the eastern fence line.

The varsity softball field is immediately east of the JV softball field and consists of a gravel infield and a grass outfield. There is an announcer's tower with a snack bar below. There is one set of bleachers on the northern fence line along with one dugout. The other dugout is on the western side. There are batting cages at the southern end along with storage and a bull pen.

The SLV currently has no lights supporting the sports fields and hosts all sporting events during daylight hours. Football games are played on Saturdays, in late morning or early afternoon. In the past, SLV has played night football games on Friday or Saturday evenings as away games instead of on campus; this typically occurs several times per season but varies each year. For the football games held on campus, attendance ranges from 500 attendees for most football games to up to 1,000 attendees for a rivalry or homecoming game. All other sporting events (e.g., baseball and softball games) and special events are currently held on campus during daylight hours on weekdays. The approximate attendance for these other events is up to 200 people.

3.1.2 Proposed Development

3.1.2.1 *Schedule of Use*

The use of the field lights and public address system would shift the timing of some sports games, practices, and events to later in the evening. Table 3.1-1 below describes the proposed schedule for games, practices, and events utilizing the field lights and PA system.

Table 3.1-1 : Proposed Use of the Field Lights and Public Address System		
Proposed Use of Field	Use of Field Lights	Use of Public Address System
Sports Games	A total of up to four nights of varsity/junior varsity interscholastic competition per annual season, comprised of the annual seasons for football, boy's and girls' soccer (four games each), baseball and softball (four games each) concluding by 10:00 PM at the latest ¹ In total, 20 evening games on campus per year.	Yes (play-by-play commentary only permitted during football games). All other athletic competitions shall limit the use of the public address systems to announcements, warm-up music or similar uses without running commentary.
Sports Practices	Monday through Friday, concluding by 8:30 PM. Not during weekend nights unless under unusual circumstances approved by the Superintendent or designee	No
Holiday Use	The stadium field lights will not be used on school holidays, or in the period of time between commencement ceremonies and the beginning of sports practice for the fall season ²	No
Non-School Related Groups	The stadium field lights will not be used by Non-School Related Groups	No
¹ Football competitions would typically end by 10:00 PM; all other competitions would typically end by 8:30 PM. Adequate lighting (non-competition level) would be maintained after games to allow for safe exiting of the field.		

Table 3.1-1 : Proposed Use of the Field Lights and Public Address System

² First day of practice for fall sports is the beginning of August.
--

3.1.2.2 *Attendance*

The estimated attendance for athletic competitions upon installation of the proposed field lights would vary by sport and other factors, such as level of competition (e.g. regular season vs. postseason) and weather conditions. As described in Section 2.2.1 Existing Development, under existing conditions the highest attendance is typically for football games, with up to 500 attendees for most football games, increasing to up to 1,000 attendees for a rivalry or homecoming game. All other sporting events would have up to 200 attendees. Football games take place during afternoon hours or off-site at night at various stadiums with lights. An increase in the number of sporting events at the SLV campus would occur, as the existing night football games at other stadiums would be played on-campus with the installation of the stadium lights. All varsity football games would be hosted on SLV campus on Friday evenings, which would increase the number of sporting events hosted on campus by one to two games (as no offsite games at other stadiums would occur). While the proposed field lights would shift the timing of games and events into the evening, the number of attendees at these events is not anticipated to change from existing levels because the nature of the events would not change and the bleacher seating capacity would not increase.

3.1.2.3 *Physical Design*

Field Lights

Football Field

The physical elements of the proposed football field lighting include four 90-foot tall light poles. Two light poles would be located on both the eastern and western sides of the field, adjacent to each end of the home and away bleachers (see Figure 3.1-1: Conceptual Football Field Site Plan). The light poles would be affixed with LED luminaires.¹ Each of the light poles would include lighting fixtures at varying heights to illuminate different areas of the track and sports field (i.e. bleachers, playing field, entryways), with the majority of luminaires installed at the poles' maximum height. In total, the light poles would provide 44 luminaires and have a maximum load of 55.36 kW.

The football field luminaires would be Musco Luminaire TLC-LED-1500. The color temperature would be approximately 5,700 kelvin (K), which is the recommended color temperature for sports lighting, and is the maximum color temperature adopted by the DarkSky International.² These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

¹ A luminaire, otherwise known as a light fixture, is defined as complete lighting unit, comprised of a light source (lamp or lamps), together with the parts that distribute and direct the light, position and protect the lamps, and connect the lamps to the power supply.

² DarkSky. Outdoor Sports Lighting Guidelines. Accessed April 8, 2025. <https://darksky.org/what-we-do/darksky-approved/outdoor-sports-lighting/guidelines/>

Baseball Field

The physical elements of the proposed baseball field lighting include six 80-foot tall light poles. Two light poles would be located along the first base line (one of which will also be used for the JV softball field), two poles would be located along the third base line, and two poles would be located along the outfield fence (see Figure 3.1-2 Conceptual Baseball Field Site Plan). The light poles would be affixed with LED luminaires. Each of the light poles would include lighting fixtures at varying heights to illuminate different areas of the field (i.e. bleachers, playing field, entryways), with the majority of luminaires installed at the poles' maximum height. In total, the light poles would provide 40 luminaires and have a maximum load of 42.04 kW.

The baseball field luminaires would be Musco Luminaire Types TLC-LED-1200, TLC-LED-900, TLC-RGBW, and TLC-BT-575. The color temperature would be approximately 5,700 kelvin (K), which is the recommended color temperature for sports lighting, and is the maximum color temperature adopted by the DarkSky International.³ These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

Softball Fields

The physical elements of the proposed softball fields lighting include one 80-foot and seven 70-foot tall light poles. One light pole (also to be used to illuminate the baseball field) would be located on the western side of the softball fields, one light pole would be located on the eastern side of the softball fields, and three light poles would be located along both the northern and southern sides of the softball fields (see Figure 3.1-3 Conceptual Softball Field Site Plan). The light poles would be affixed with LED luminaires. Each of the light poles would include lighting fixtures at varying heights to illuminate different areas of the field (i.e. bleachers, playing field, entryways), with the majority of luminaires installed at the poles' maximum height. In total, the light poles would provide 50 luminaires and have a maximum load of 45.27 kW.

The softball field luminaires would be Musco Luminaire Types TLC-LED-1200, TLC-LED-900, TLC-RGBW, and TLC-BT-575. The color temperature would be approximately 5,700 kelvin (K), which is the recommended color temperature for sports lighting, and is the maximum color temperature adopted by the DarkSky International.⁴ These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

Public Address System

As described in Section 3.3.1 Existing Development, there are currently three loudspeakers attached to the stadium press box on the eastern bleachers and two speakers at each baseball and softball announcers' booths. The project proposes the replacement of the existing speaker systems with newer versions. The project would not increase the number of speakers or expand them to

³ DarkSky. Outdoor Sports Lighting Guidelines. Accessed April 8, 2025. <https://darksky.org/what-we-do/darksky-approved/outdoor-sports-lighting/guidelines/>

⁴ DarkSky. Outdoor Sports Lighting Guidelines. Accessed April 8, 2025. <https://darksky.org/what-we-do/darksky-approved/outdoor-sports-lighting/guidelines/>

different areas of the SLV campus. The proposed PA system would be designed to conform to the exterior noise limits set forth by the Santa Cruz County Noise Control Ordinance. The maximum volume of the proposed speaker system would not exceed the current maximum volume of the existing speaker system.

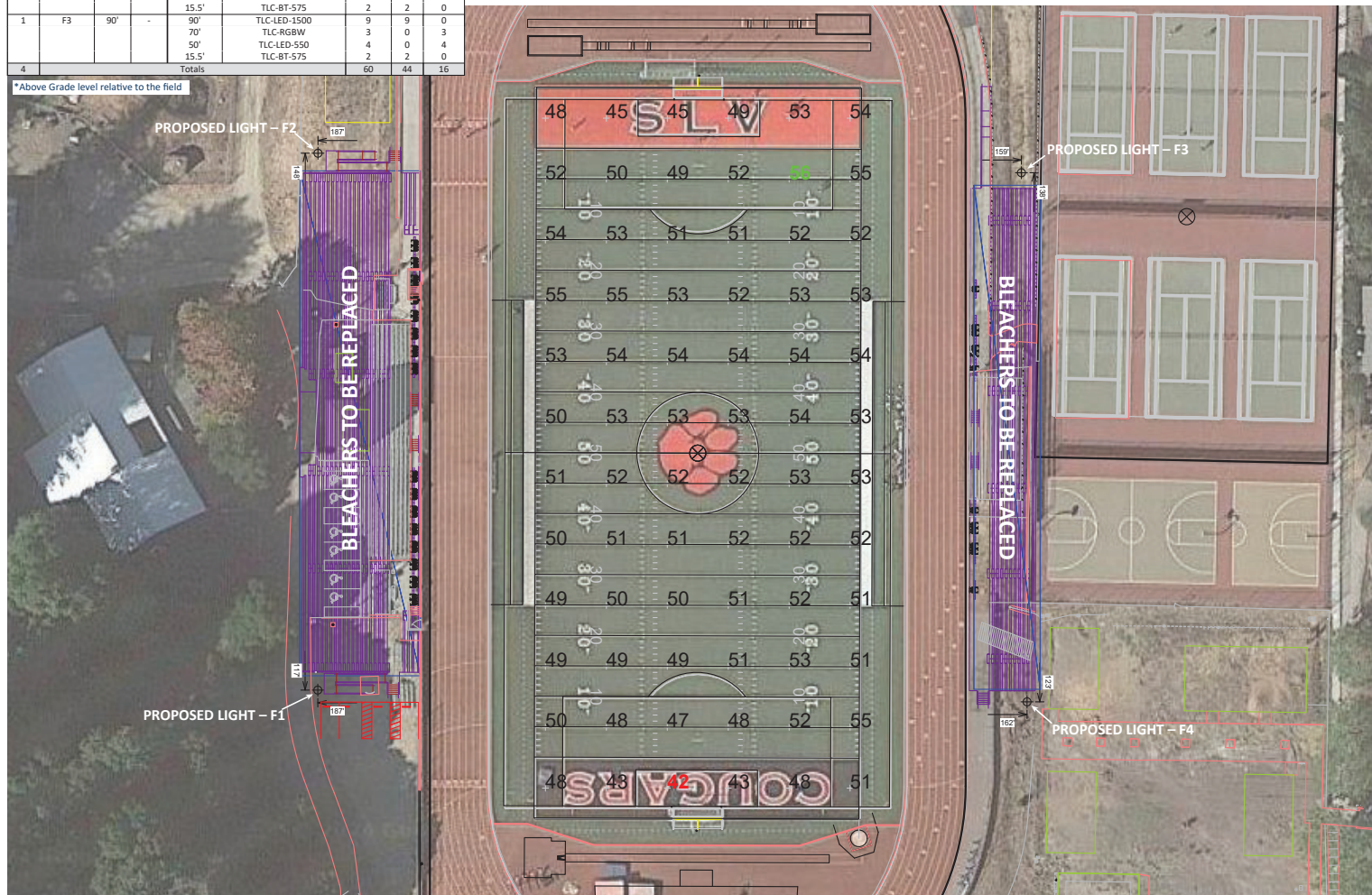
Bleachers, Press Boxes, Snack Shack, and Restroom

The project would replace the aging bleachers for all three fields. The proposed bleachers would have the same location and massing footprint as the existing bleachers and would not increase seating capacity for attendees. The project would include two press boxes; one attached to the proposed baseball bleachers and one attached to the proposed softball bleachers located at the southwest corner of the field (not for the bleachers in the northeast corner). The press boxes would be a maximum of 250 square feet each.

The project would also construct a single story building with a snack shack and restroom between the softball and baseball fields. The existing announcer's tower, snack bar, and restrooms would be removed.

Equipment List For Areas Shown								
Pole			Luminaires					
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
3	F1-F2 F4	90'	-	90'	TLC-LED-1500	9	9	0
				70'	TLC-RGBW	3	0	3
				15.5'	TLC-BT-575	2	2	0
1	F3	90'	-	90'	TLC-LED-1500	9	9	0
				70'	TLC-RGBW	3	0	3
				50'	TLC-LED-550	4	0	4
				15.5'	TLC-BT-575	2	2	0
4				Totals		60	44	16

*Above Grade level relative to the field



Grid Summary	
Name	Football
Size	360' x 160'
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary	
	MAINTAINED HORIZONTAL FOOTCANDLES
	Entire Grid
Guaranteed Average	50
Scan Average	51.20
Maximum	56
Minimum	42
Avg/Min	1.23
Guaranteed Max/Min	2
Max/Min	1.34
UG (adjacent pts)	1.12
CU	0.47
No. of Points	72
LUMINAIRE INFORMATION	
Applied Circuits	A
No. of Luminaires	44
Total Load	55.36 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume $\pm 3\%$ nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



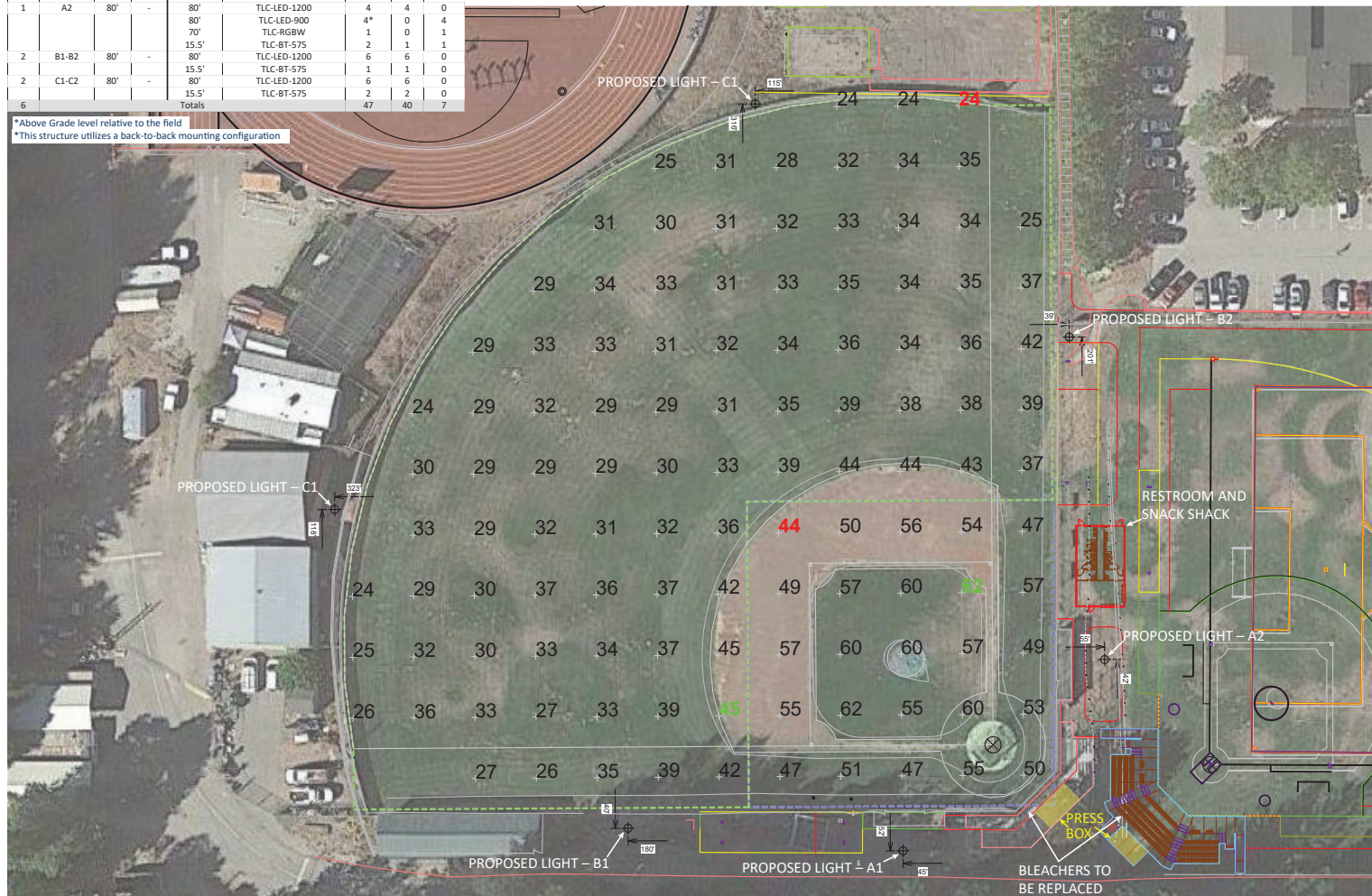
Source: Musco Sports Lighting, LLC, March 13, 2024.

CONCEPTUAL FOOTBALL FIELD SITE PLAN

FIGURE 3.1-1

Equipment List For Areas Shown									
Pole			Luminaires						
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS	
1	A1	80'	-	80'	TLC-LED-1200	4	4	0	
				70'	TLC-RGBW	1	0	1	
				15.5'	TLC-BT-575	1	1	0	
1	A2	80'	-	80'	TLC-LED-1200	4	4	0	
				80'	TLC-LED-900	4*	0	4	
				70'	TLC-RGBW	1	0	1	
				15.5'	TLC-BT-575	2	1	1	
2	B1-B2	80'	-	80'	TLC-LED-1200	6	6	0	
				15.5'	TLC-BT-575	1	1	0	
2	C1-C2	80'	-	80'	TLC-LED-1200	6	6	0	
				15.5'	TLC-BT-575	2	2	0	
6				Totals		47	40	7	

*Above Grade level relative to the field
 *This structure utilizes a back-to-back mounting configuration



Grid Summary		
Name: Baseball		
Size: 315'/340'/315' - basepath 90'		
Spacing: 30.0' x 30.0'		
Height: 3.0' above grade		

Illumination Summary		
	Infield	Outfield
Guaranteed Average	50	30
Scan Average	54.17	32.98
Maximum	62	45
Minimum	44	24
Avg/Min	1.24	1.37
Guaranteed Max/Min	2	2.5
Max/Min	1.41	1.88
UG (adjacent pts)	1.20	1.50
CU	0.75	
No. of Points	25	90
LUMINAIRE INFORMATION		
Applied Circuits	C	
No. of Luminaires	40	
Total Load	42.04 kW	

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.
Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.
Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.
Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



Source: Musco Sports Lighting, LLC, March 13, 2024.

CONCEPTUAL BASEBALL FIELD SITE PLAN

FIGURE 3.1-2

Equipment List For Areas Shown									
Pole				Luminaires					
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS	
1	A2	80'	-	80'	TLC-LED-1200	4	0	4	
				80'	TLC-LED-900	4*	4	0	
				70'	TLC-RGBW	1	0	1	
				15.5'	TLC-BT-575	2	1	1	
3	A3-A5	70'	-	70'	TLC-LED-900	4	4	0	
				60'	TLC-RGBW	1	0	1	
				15.5'	TLC-BT-575	1	1	0	
2	B3	70'	-	70'	TLC-LED-1200	5	5	0	
	B5	70'	-	15.5'	TLC-BT-575	2	2	0	
1	B4	70'	-	70'	TLC-LED-1200	3	3	0	
				70'	TLC-LED-900	3	3	0	
				15.5'	TLC-BT-575	2	2	0	
1	B6	70'	-	70'	TLC-LED-1200	4	4	0	
				70'	TLC-LED-900	2	2	0	
				15.5'	TLC-BT-575	2	2	0	
8				Totals		59	50	9	

*Above Grade level relative to the field
 *This structure utilizes a back-to-back mounting configuration



Source: Musco Sports Lighting, LLC, March 13, 2024.

Grid Summary	
Name	Soccer Multipurpose
Size	360' x 180'
Spacing	30.0' x 30.0'
Height	3.0' above grade

Illumination Summary	
MAINTAINED HORIZONTAL FOOTCANDLES	
Entire Grid	
Guaranteed Average	30
Scan Average	37.90
Maximum	62
Minimum	30
Avg/Min	1.27
Guaranteed Max/Min	2.5
Max/Min	2.09
UG (adjacent pts)	1.43
CU	0.47
No. of Points	72
LUMINAIRE INFORMATION	
Applied Circuits	F
No. of Luminaires	50
Total Load	45.27 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document and includes a 0.95 dirt depreciation factor.

Field Measurements: Individual field measurements may vary from computer-calculated predictions and should be taken in accordance with IESNA RP-6-15.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume $\pm 3\%$ nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.



CONCEPTUAL SOFTBALL FIELD SITE PLAN

FIGURE 3.1-3

3.1.2.4 *Parking*

At SLV, a total of 446 standard parking stalls and nine accessible stalls are available for attendees of sporting events. Available parking is distributed between four parking lots on-campus. As the most highly attended events, e.g. football games attracting up to 1,000 attendees, would bring more attendees to the campus than there are available parking spaces, some overflow parking would occasionally occur onto surrounding streets north of the campus, such as Hacienda Drive, Capelli Drive, and El Soyo Heights, as currently occurs. There is no additional parking proposed as part of the project as attendance at sporting events is not expected to increase.

3.1.2.5 *Construction Schedule and Details*

Construction of the various project components may occur simultaneously or non-simultaneously, depending on the procurement of project funds. Should construction occur non-simultaneously, the two construction segments would occur as described below.

Construction of Lights and PA System

Construction of the lights and updated PA system would occur over a period of six months. Construction activities would include materials delivery, excavation for pole foundation installation, trenching and boring for electrical conduit installation, installation via hydraulic crane of the lighting poles, mounting of the luminaires, and restoration of disturbed surfaces including pavement and landscaping that was removed during excavation and trenching. Typical construction equipment would be used, such as an excavator, boring machine, concrete truck and pump, and a crane for pole installation and luminaire mounting, as well as semi-trucks for materials delivery.

Construction would occur during the allowable hours set forth in the Santa Cruz County Code (SCCC) for nonresidential properties. In these areas, construction is permitted between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 6:00 p.m. on Saturdays.

Construction of Bleachers, Press Boxes, and Snack Shack

The construction of stadium bleachers with an integrated press box, restroom, and snack bar would occur over a period of three to six months. Construction activities would include site preparation, foundation work, structural assembly, and utility installations. The process would begin with grading and compacting the site, followed by pouring concrete footings and piers to support the bleachers' steel or aluminum framework. The main structure would then be erected using cranes, scissor lifts, and welding equipment to secure the seating rows, railings, and stairways. The press boxes, often constructed from prefabricated metal or modular units, would be lifted into place and secured, while the restrooms and snack bar would require additional plumbing, electrical, and HVAC installations. Materials such as concrete, steel framing, prefabricated panels, and composite decking could be used. Typical construction equipment, such as excavators, forklifts, concrete mixers, and power tools, would be used.

Construction would occur during the allowable hours set forth in the SCCC for nonresidential properties. In these areas, construction is permitted between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 6:00 p.m. on Saturdays.

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Noise
4.3	Air Quality	4.14	Population and Housing
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.16	Recreation
4.6	Energy	4.17	Transportation
4.7	Geology and Soils	4.18	Tribal Cultural Resources
4.8	Greenhouse Gas Emissions	4.19	Utilities and Service Systems
4.9	Hazards and Hazardous Materials	4.20	Wildfire
4.10	Hydrology and Water Quality	4.21	Mandatory Findings of Significance
4.11	Land Use and Planning		

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project’s impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Mitigation measures are numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. There are no state-designated scenic highways in the Town of Felton. Highway 9, which includes segments in the Town of Felton, is an eligible, but not officially designated, State Scenic Highway.⁵

Santa Cruz County General Plan/Local Coastal Program (LCP)

The Santa Cruz County General Plan/LCP contains the following policies which are specific to aesthetics and are applicable to the proposed project:

Policy	Description
ARC-5.1.1	Designation of Visual Resources. Designate on the General Plan/LCP Resources and Constraints Maps and define visual resources as areas having regional public importance for their natural beauty or rural agricultural character. Include the following areas when mapping visual resources: vistas from designated scenic roads, Coastal Special Scenic Areas, and unique hydrologic, geologic, and paleontological features identified on Goal 6. 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-5.1.2	Development Within Visual Resource Areas. Recognize that designated visual resources of Santa Cruz County possess diverse characteristics that are worthy of protection. Require projects in visual resource areas to be evaluated against the context of their unique environments and regulate and regulate structure height, setbacks, materials, and design to protect these resources consistent with the objectives and policies of this section.

⁵ California Department of Transportation. "Scenic Highways." Accessed January 9, 2025.
<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

- ARC-5.1.3 **Protection of Public Vistas and Scenic Assets.** Protect significant public vistas and public scenic assets as identified in Policy ARC-5.1.1, even those that are not mapped and designated as visual resource areas, scenic roads, coastal special scenic areas, or other unique features, by minimizing disruption of landform and aesthetic character caused by grading operations, timber harvests, utility wires and poles, signs, inappropriate landscaping and structure design. Provide necessary landscaping to screen development that is unavoidably sited within these vistas. Proposed landscaping within public vistas should be sited and designed to retain existing public views of vistas and scenic assets over the life of the development whenever feasible, and especially for coastal designated visual resources.
- ARC-5.2.1 **Designation of Scenic Roads.** The following roads and highways are valued for their vistas: List includes Highway 9 – from Route 1 to Santa Clara County.

Santa Cruz County Code

Chapter 13.10 of the Santa Cruz County Code (SCCC) contains the County’s zoning regulations, which regulates development and new structures. Chapter 13.10.361 through Chapter 13.10.366 outlines regulations specific to the Public and Community Facility PF District.

4.1.1.2 *Existing Conditions*

Project Site

The project site is part of the existing SLV campus located at 7105 Highway 9 in the Town of Felton. The project site consists of the existing football field, two softball fields, and one baseball field. The fields are located around the outer perimeter of the SLV campus starting at the southernmost side of the campus and wrapping around the west side of the campus.

As described in Section 3.0 Project Description, the football field consists of a rubberized track, turf athletic field, two sets of metal bleachers on the eastern and western sides of the track, and portable storage/restroom buildings along the perimeter of the track. The home bleachers on the western side of the track have an attached press box which extends approximately twenty feet above the top of the bleachers. The press box includes three loudspeakers.

The varsity baseball field consists of a grass outfield, clay/gravel/grass infield, and a pitchers’ mound. There is a single set of bleachers behind the backstop and dugouts on the southeast end of the field. Next to the bleachers are restrooms, snack bar, lockers, an announcer’s tower with speakers and a covered bullpen on the south/west corner outside of the third base line.

The JV softball field is the westernmost softball field and is a grass field that also hosts soccer and football practices along with youth softball, little league and soccer events outside of school hours. This softball field has a gray gravel infield and grass outfield with a backstop on the northeast corner of the field. There is one set of bleachers along the northern fence line along with a dugout. The second dugout is on the eastern fence line.

The varsity softball field is immediately east of the JV softball field and consists of gray gravel infield and a grass outfield. There is an announcer’s tower with a snack bar below. There is one set of

bleachers on the northern fence line along with one dugout. The other dugout is on the western side. There are batting cages at the southern end along with storage and a bull pen.

Surrounding Land Uses

To the south of the project site is a parcel that has a General Plan designation of Mountain Residential (R-M). East of the project site, before the highway, are parcels with a General Plan designation of Community (C-C). Land uses to the north and east of the project site are mainly residential.

SLV Elementary School and SLV Middle School are connected to the SLV campus, north of SLV High School.

The site is located within the Santa Cruz Mountain range and is directly bordered to the west by the Fall Creek State Park Forest. Land uses to the north are mainly residential. The site is bordered to the east by Highway 9, adjacent to which is the San Lorenzo Valley River and residential land uses. Directly east of the softball field are commercial and residential land uses. Limited forest land and residential land uses are located south of the site. Overall, the surrounding aesthetic environment is characterized primarily by one-story residential and commercial buildings, as well as rural landscaping and forested land. Views of the site are limited to immediate surrounding parcels and Highway 9.

The campus is not located on a ridgeline or hillside, and the campus is relatively flat, with an average site elevation ranging from 330 to 350 feet above sea level. The forested land to the west slopes downward towards the campus. Due to the existing development in the project area, views of the SLV campus are limited to the immediate surrounding area, and only those buildings and other site features that can be seen from adjacent public streets, while a portion of the interior of the campus is not readily visible from off-site and does not contribute to the visual character of the area.

Scenic Vistas and Corridors

As described in the Santa Cruz County General Plan/LCP EIR, much of the Santa Cruz Mountains range, which comprises deep valleys and forested slopes, provides public views of the scenic natural areas along public roads and numerous recreational trails. Natural scenic resources in this region include dense redwood forest, oak woodland and chaparral, and other unique vegetation communities.

The project site is not located within a designated scenic vista or view corridor and is not visible from a designated scenic highway. There are no state highways in the County that have been officially designated as State Scenic Highways. Highway 9, between Highway 17 and Highway 35, is a designated state scenic highway in Santa Clara County, but the portion of Highway 9 that the project site is located on is located within Santa Cruz County and is not part of this designation. Highway 9 is an Eligible State Scenic Highway that has the potential to be officially designated in the

future. Additionally, the Santa Cruz County's General Plan/LCP identifies Highway 9 as a scenic roadway valued for its vistas.

Light and Glare

Primary sources of glare in the site vicinity include exterior building light, street lighting, security lighting, and vehicle lights.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? ⁶ If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

The County's General Plan/LCP identifies Highway 9 as a scenic roadway valued for its vistas. Per the General Plan/LCP, public vistas from County-designated scenic roads are afforded protection, and developments that could affect these vistas are carefully reviewed. The SLV campus is visible from Highway 9 in the portions of the highway directly adjacent to the campus. The existing trees and campus facilities currently limit views on Highway 9 of the adjacent Santa Cruz Mountains to the west; therefore only partial views are available.

Implementation of the project would allow for campus improvements, including the installation of field lights and an upgraded PA system, the construction of a restroom and snack shack, the replacement of aging bleachers, and construction of two press boxes on an existing school campus.

⁶ Public views are those that are experienced from publicly accessible vantage points.

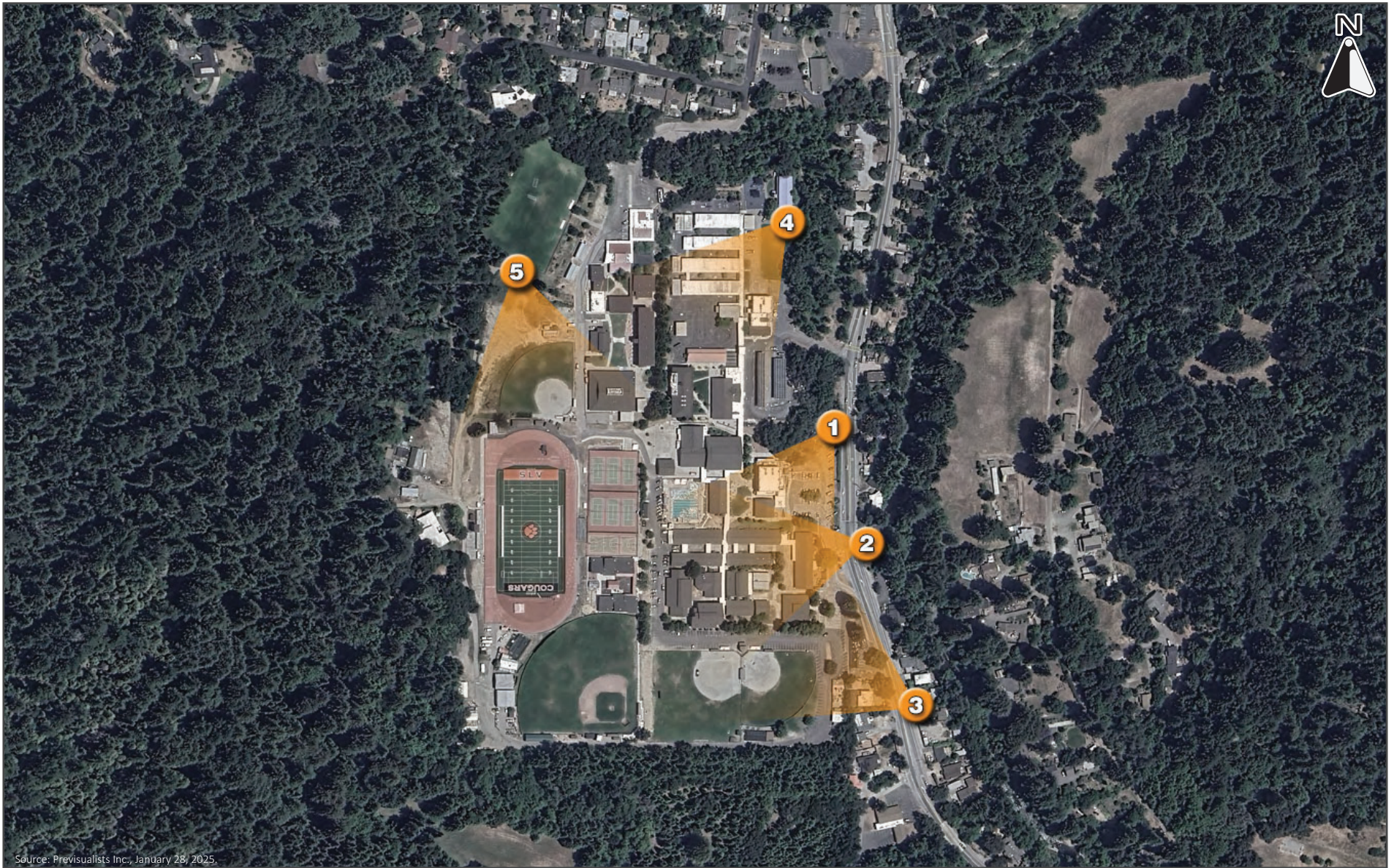
The replacement of the existing bleachers onsite would not constitute a change in public views, as the proposed bleachers would be similar in massing and location as existing bleachers. The press boxes would be attached to the proposed bleacher replacements at the softball and baseball fields and would not be visible from Highway 9. The proposed restroom and snack shack would be one-story in height and would not be visible from Highway 9.

The primary visual component of the project would be the introduction of 18 light poles, which would range in height from 70 to 90 feet. The proposed lights would introduce new structures within the viewshed and would be visible from certain portions of Highway 9. Therefore, photostimulations were prepared to show the visual change expected to result from the proposed lights. Figure 4.1-1 provides a map of the various public vantage points for which photosimulations were prepared. Figures 4.1-2 through Figure 4.1-6 show both existing and proposed views for the locations mapped in Figure 4.1-1. The location and height of the various poles are summarized below.

Football Field Lights: The football field lighting would include four 90-foot tall light poles. Two light poles would be located on both the eastern and western sides of the field, adjacent to each end of the home and away bleachers (see Figure 3.1-1: Conceptual Football Field Site Plan).

Baseball Field Lights: The baseball field lighting would include six 80-foot tall light poles. Two light poles would be located along the first base line (one of which will also be used for the JV softball field), two poles would be located along the third base line, and two poles would be located along the outfield fence (see Figure 3.1-2: Conceptual Baseball Field Site Plan).

Softball Field Lights: The softball fields lighting would include one 80-foot and seven 70-foot tall light poles. One light pole (also to be used to illuminate the baseball field) would be located on the western side of the softball fields, one light pole would be located on the eastern side of the softball fields, and three light poles would be located along both the northern and southern sides of the softball fields (see Figure 3.1-3: Conceptual Softball Field Site Plan).



Source: Previsualists Inc., January 28, 2025.

PHOTOSIMULATION LOCATIONS

FIGURE 4.1-1



EXISTING VIEW



PROPOSED VIEW

Source: Previsualists Inc., January 28, 2025.



EXISTING VIEW



PROPOSED VIEW

Source: Previsualists Inc., January 28, 2025.



EXISTING VIEW



PROPOSED VIEW

Source: Previsualists Inc., January 28, 2025.



EXISTING VIEW



PROPOSED VIEW

Source: Previsualists Inc., January 28, 2025.



EXISTING VIEW



PROPOSED VIEW

Source: Previsualists Inc., January 28, 2025.

As shown in Figures 4.1-2 through 4.1-6, the lights would be intermittently visible from public rights-of-way. The proposed lights would not result in the degradation of public views of the site and the Santa Cruz Mountains vistas. The lights would not be visually obtrusive from public viewpoints and would be partially screened from view by existing trees and buildings. Although taller than existing development, the proposed light poles would not be out of character with the communications infrastructure (i.e. telephone poles and wires) that is common to the area, nor would the light poles be visually incompatible with existing development at SLV. Pole-mounted sports lights are common features of public educational facilities throughout the state and are typically found adjacent to roadways. Therefore, the project would not have a substantial adverse effect on a scenic vista **(Less than Significant Impact)**

-
- b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
-

The project site is not located along a state-designated scenic highway. The project does not propose to remove any on-site trees or street trees. Therefore, implementation of the proposed project would not damage any scenic resources, such as trees, rock outcroppings, and historic buildings within a state scenic highway. **(Less than Significant Impact)**

-
- c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
-

The project is located in an aesthetic environment characterized primarily by one-story residential and commercial buildings, as well as rural landscaping and forested land. As discussed under Checklist Question a), the primary visual component of the project would be the introduction of 18 light poles, which would not result in the degradation of public views of the site and the Santa Cruz Mountain vistas. The proposed field lights would not detract from the single-family residential character of the surrounding neighborhoods. The project site is located in a suburban area which contains existing light sources (car lights, security lights, and external building lights). The proposed lights would marginally contribute to existing light levels but would not remove or diminish any recognized nighttime viewpoint in the area, such as a lookout point or an observatory. For further discussion on light and glare, refer to Checklist Question d) below.

Chapter 13.11.040 of the SCCC would require the project to obtain a Site Development Permit approval from the County, so final design of the project would be subject to design review by the County. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**

-
- d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
-

Depending on factors such as brightness, size, reflectivity, and angle of viewing, lighting has the potential to cause substantial light impacts or glare that could adversely affect views.

The light poles would be affixed with LED luminaires.⁷ The light poles would introduce new sources of light in the project area and are described in further detail below.

Football Field Lights: The light poles would provide 44 luminaires. The football field luminaires would be Musco Luminaire TLC-LED-1500. These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

Baseball Field Lights: The light poles would provide 40 luminaires. The baseball field luminaires would be Musco Luminaire Types TLC-LED-1200, TLC-LED-900, TLC-RGBW, and TLC-BT-575. These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

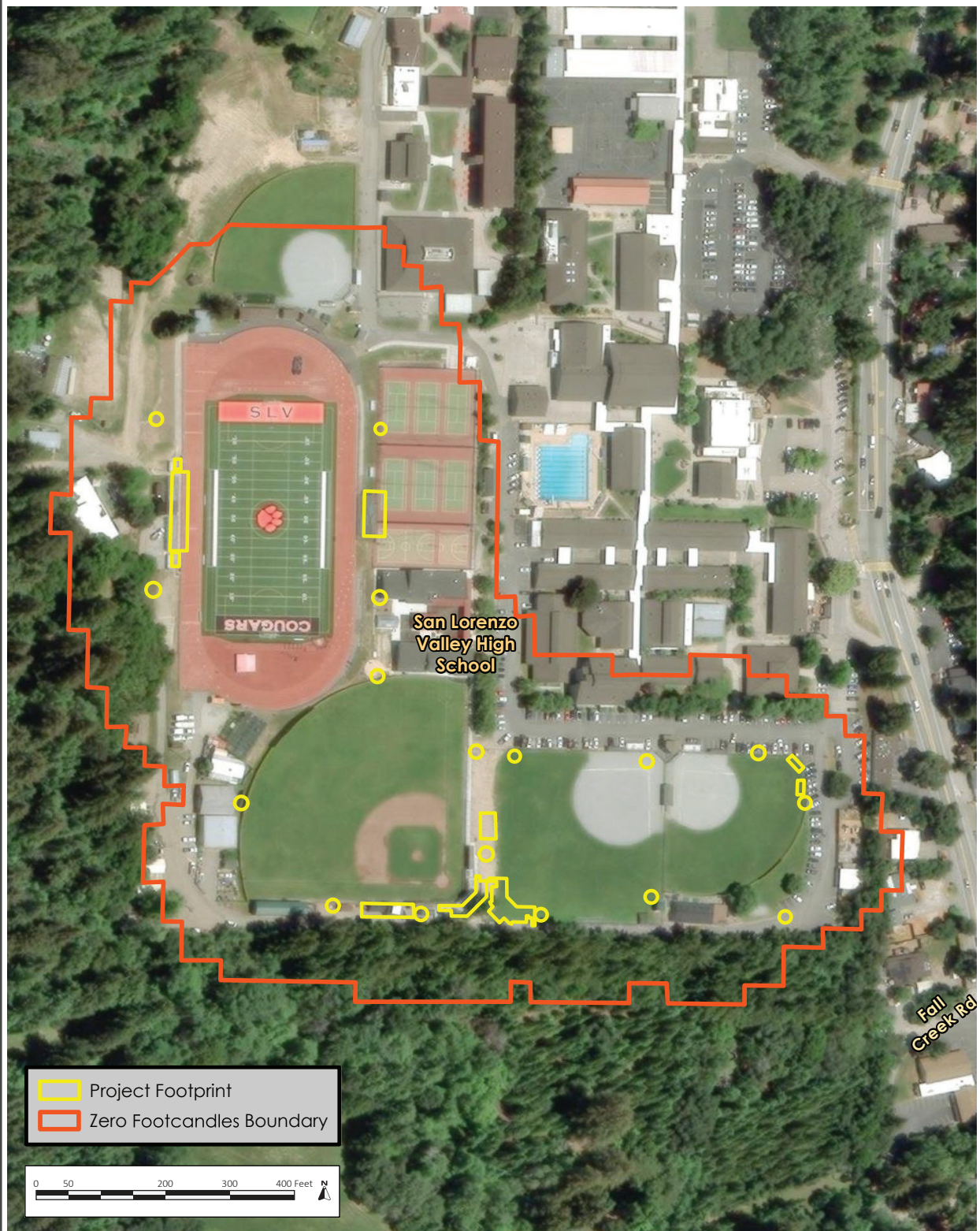
Softball Fields Lights: The light poles would provide 50 luminaires. The softball field luminaires would be Musco Luminaire Types TLC-LED-1200, TLC-LED-900, TLC-RGBW, and TLC-BT-575. These lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field.

The field lights are proposed to allow for flexibility in use and safe nighttime use of the existing football, baseball, and softball fields. The lights would also allow for safe egress from the fields following nighttime events.

The proposed lights would be designed to focus the beam onto the playing surface and minimize the amount of light escaping into the sky or onto adjacent uses. Further, existing structures and vegetation would provide additional shielding. The majority of the light generated by the proposed field lighting would be contained within the existing site, with minimal spillover light dissipating to zero footcandles (fc) within 200 feet of the project site boundaries.⁸ The spillover light levels at the adjacent uses would be negligible. No spill light would occur at the adjacent residential properties, as shown in Figure 4.1-7, which depicts the distance required for light spillage to reach zero footcandles.

⁷ A luminaire, otherwise known as a light fixture, is defined as complete lighting unit, comprised of a light source (lamp or lamps), together with the parts that distribute and direct the light, position and protect the lamps, and connect the lamps to the power supply.

⁸ Spillover light is any light where it is unintended or unwanted.



Source: H.T. Harvey & Associates, April 2026.

Light levels are generally additive. As discussed previously, streetlights, headlights, security lighting, and other sources of light currently illuminate the project area. When in use, spill light from the sports lighting would add to these existing light levels. While the proposed field lights would increase nighttime light levels immediately adjacent to the site, the spill light would be confined to the existing SLV campus; no spill light would occur on the adjacent uses. **(Less than Significant Impact)**

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.⁹

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.¹⁰

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.¹¹ Programs such as CAL FIRE's Fire and Resource Assessment Program are used to identify whether forest land, timberland, or timberland production areas could be affected are located on or adjacent to a project site.¹²

⁹ California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed January 9, 2025. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>.

¹⁰ California Department of Conservation. "Williamson Act." <http://www.conservation.ca.gov/dlrp/lca>.

¹¹ Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).

¹² California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed January 9, 2025. <http://frap.fire.ca.gov/>.

4.2.1.2 Existing Conditions

The project site is not designated, zoned, or used for agricultural purposes, forest land, or timberland. The parcel adjacent to the southern portion of the site is zoned for timberland production (TP). The project site is not subject to a Williamson Act contract.¹³

The project site is in an area designated as Urban and Built-Up Land.¹⁴ Urban and Built-Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel.¹⁵ The site currently operates as a school.

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) 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))?	☐	☐	☐	☒
d) Result in a loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

¹³ CA department of Conservation. "California Williamson Act Enrollment Finder." Accessed February 3, 2025. <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html>.

¹⁴ CA department of Conservation. "California Important Farmland Finder." Accessed January 9, 2025. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

¹⁵ CA department of Conservation. "Important Farmland Categories." Accessed February 3, 2025. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>.

-
- a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
-

As discussed above in Section 4.2.1.2 Existing Conditions, the project is designated Urban and Built-Up Land. There is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the site. The proposed project would not impact agricultural resources by conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural usage. **(No Impact)**

-
- b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
-

The project is not zoned for agricultural use and is not under a Williamson Contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. **(No Impact)**

-
- c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?
-

The site is not zoned as forest land or timberland. The site is adjacent to a parcel zoned as TP. Implementation of the project would allow for campus improvements, including the installation of field lights and an upgraded PA system, the construction of a restroom and two press boxes, and the replacement of aging bleachers on an existing school campus. The project would not change the zoning of the project site or adjacent parcels. Therefore, the project would not conflict with the adjacent TP zoning designation.

Therefore, impacts related to conflicts with existing zoning or rezoning of forest land, timberland, or timberland zoned Timberland Production would not occur. **(No Impact)**

-
- d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?
-

The project site is not used or designated for forest land and would not result in a loss of forest land or conversion of forestland to non-forest use. **(No Impact)**

-
- e) Would the project 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?
-

Development of the project would be confined to the project site; no indirect impacts to agricultural or forest land would occur. Therefore, the project would not 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. **(No Impact)**

4.3 Air Quality

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Criteria air pollutants are pollutants that have established federal or State standards for outdoor concentrations to protect public health. Pursuant with the federal and State Clean Air Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforced the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM₁₀), particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), sulfur dioxide (SO₂), and lead. The CAAQS also includes visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Unlike criteria air pollutants, which have a regional impact, TACs are highly localized and regulated at the individual emissions source level.

DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. DPM is comprised of diesel exhaust which is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (i.e., areas most susceptible to injury).¹⁶ Chemicals in diesel exhaust, such as benzene and formaldehyde, are also TACs identified by the CARB.

An overview of the sources of criteria pollutants and TACs, as well as their associated health effects, is provided in Table 4.3-1.

¹⁶ California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed January 9, 2025. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

Table 4.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants

Pollutants	Description and Sources	Primary Effects
Ozone (O ₃)	O ₃ is a secondary criteria air pollutant that is the result of a photochemical (sunlight) reaction between reactive organic gases (ROG) and nitrogen oxides (NO _x). Pollutants emitted by motor vehicles, power plants, industrial boilers, refineries, and chemical plants are the common sources for this reaction. High O ₃ levels are caused by the cumulative emissions of ROG and NO _x . These precursor or primary pollutants react under certain meteorological conditions to form high O ₃ levels. Common sources of ROG and NO _x are vehicles, industrial plants, and consumer products.	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO ₂)	NO ₂ is a reactive gas that combines with nitric oxide (NO) to form NO _x . NO ₂ is the byproduct of fuel combustion, with common sources of NO ₂ being emissions from cars, trucks, buses, power plants, and off-road equipment. Other sources of NO ₂ include high temperature stationary combustion and atmospheric reactions.	• Aggravation of respiratory illness • Reduced visibility
Carbon Monoxide (CO)	CO is a colorless, odorless, and toxic gas that is the product of incomplete combustion of carbon-containing substances (e.g., when something is burned). Common outdoor sources of CO include mobile vehicles (passenger cars and trucks) and machinery that burn fossil fuels.	• Interferes with oxygen delivery to the body's organ due to binding with the hemoglobin in the blood • Fatigue, headaches, confusion, and dizziness
Fine Particulate Matter (PM _{2.5}) and Coarse Particulate Matter (PM ₁₀)	Particulate Matter (PM) is any material that is emitted as liquid or solid particles or a gaseous material, such as dust, soot, aerosols, and fumes. PM ₁₀ and PM _{2.5} are both small enough particulates to be inhaled into the human lungs, and PM _{2.5} is small enough to deposit into the lungs, which poses an increased health risk compared to PM ₁₀ . Typical sources of PM include stationary combustion of solid fuels, construction activities, vehicles, industrial processes, and atmospheric chemical reactions.	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Sulfur Dioxide (SO ₂)	SO ₂ is a pungent and colorless gaseous pollutant. SO ₂ is part of the sulfur oxides (SO _x) group and is the pollutant of greatest concern in the SO _x group. SO _x can react with other compounds in the atmosphere to form small particles. These particles contribute to pollution. SO ₂ is primarily formed from fossil fuel combustion at power plants and other industrial facilities. Sources of SO ₂ include motor vehicles, locomotives, ships, and off-road diesel equipment that are operated with fuels that contain high levels of sulfur. Industrial processes, such as natural gas and petroleum extraction, oil refining, and metal processing.	• Aggravation of respiratory illness • Respiratory irritation such as wheezing, shortness of breath and chest tightness • Increased incidence of pulmonary symptoms and disease, decreased pulmonary function

Pollutants	Description and Sources	Primary Effects
Lead	Lead is a naturally occurring element that can be found in all parts of the environment including the air, soil, and water. As an air pollutant, lead is present in small particles. The most common historic source of lead exposure was the past use of leaded gasoline in motor vehicles. The exhaust resulting from use of leaded gasoline would release lead emissions into the air. Now, major sources of lead in the air are from ore and metals processing plants and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters.	Adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system
Toxic Air Contaminants (TACs)	TACs include certain air pollutants known to increase the risk of cancer and/or a range of other serious health effects. Sources of TAC include, but are not limited to, cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; and building materials and products.	- Cancer - Chronic eye, lung, or skin irritation - Neurological and reproductive disorders

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following groups who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

4.3.1.2 Regulatory Framework

Federal and State

Clean Air Act

At the federal level, the EPA is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants discussed previously; PM, O₃, CO, SO₂, NO₂, and lead.¹⁷

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of

¹⁷ NO_x is the group of nitrogen compounds (NO₂ and nitric oxide [NO]) that typically represents NO₂ emissions because NO₂ emissions contribute the majority of NO_x exhaust emissions emitted from fuel combustion.

these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Diesel Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, this plan involves the application of emission control strategies to existing diesel vehicles and equipment to reduce DPM and other pollutants. Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment, including off-road equipment, will significantly reduce emissions of DPM and NO_x.

Regional

Monterey Bay Air Resources District

The SLV campus is located in the North Central Coast Air Basin. The Monterey Bay Air Resources District (MBARD) is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the Air Basin. MBARD's Air Quality Management Plans (AQMPs) include control measures and strategies implemented to attain California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) in the Air Basin.

Air Quality Management Plan

Regional air quality management districts, such as MBARD, must prepare air quality plans specifying how federal and state air quality standards will be met. MBARD's most recently adopted plan is the 2012 – 2015 AQMP, which was adopted in March 2017. The primary elements in the updated plan are air quality trends analysis, emission inventory, and mobile source programs. MBARD's focus continues to be on achieving the 8-hour component of the California ozone standard, as the region has already attained the 1-hour standard. At the time the 2012-2015 AQMP was written, the Air Basin had been a nonattainment area for the CAAQS for both O₃ and PM₁₀. The AQMP addresses only attainment of the O₃ CAAQS. Attainment of the PM₁₀ CAAQS is addressed in the MBARD's 2005 Particulate Matter Plan.

The AQMP's emission inventory is an estimate of the amount of O₃ precursors emitted into the air each day by man-made activities, including ROG and NO_x. Mobile source emissions continue to dominate the District's NO_x emissions inventory. Lower vehicle miles traveled and cleaner exhaust standards for mobile sources remain important factors in reducing regional ROG and NO_x emissions. The following key programs and rules contained within the AQMP target a reduction in emissions while allowing for population increases:

- CARB's Low Emission Vehicle Program

- CARB's Off-Road Motor Vehicle Program
- CARB's Advanced Clean Cars
- District Rule 431, Emissions from Electric Power Boilers
- District Rule 1002 Transfer of Gasoline into Vehicle Fuel Tanks
- District Rule 426 Architectural Coatings

Despite a significant overall increase in population of over 152,292 persons within the Air Basin between 2010 and 2035 (21 percent increase), NO_x emissions are expected to decrease by over 20 tons per day (44 percent decrease) in that same time period.¹⁸

Particulate Matter Plan

The Particulate Matter Plan was adopted to fulfill the requirements of Senate Bill 655 to reduce public exposure to particulate matter. The legislation requires CARB, in conjunction with local air pollution control districts, to adopt a list of the most readily available, feasible, and cost-effective control measures that could be implemented by air control districts to reduce ambient levels of particulate matter in their air basins. The Particulate Matter Plan's proposed activities include control measures for fugitive dust, public education, administrative functions, and continued enhancements to the MBARD's smoke management and emission-reduction incentive programs.

CEQA Air Quality Guidelines

The MBARD CEQA Air Quality Guidelines were developed to assist local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potential impacts to air quality. Jurisdictions in the Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by MBARD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, MBARD rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2016 CEQA Air Quality Guidelines.

4.3.1.3 *Existing Conditions*

The North Central Coast Air Basin (Air Basin) encompasses an area of 5,159 square miles and consists of Monterey, Santa Cruz, and San Benito counties. The Air Basin is designated as a nonattainment area for the state PM₁₀ and O₃ standards and unclassified or attainment for all other state and federal standards.¹⁹

The project site consists of three existing athletic fields on the SLV campus. The project site does not directly create any criteria air pollutants, although pollutants are indirectly released via vehicle travel to and from the site.

The school is located in a residential area. The closest sensitive receptors to the project site are the single-family residences located directly east of the SLV campus on Highway 9.

¹⁸ Monterey Bay Air Resources District. 2012 – 2015 Air Quality Management Plan. March 15, 2017.

¹⁹ Santa Cruz County. Sustainability Policy and Regulatory Update. Chapter 4.3 – Air Quality. April 2022.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The SLV School District has considered the air quality thresholds updated by MBARD in March 2017 and regards these thresholds to be based on the best information available for the Air Basin and conservative in terms of the assessment of health effects.

As summarized in Table 4.3-2 below, MBARD has established thresholds of significance for criteria air pollutants of concern for construction and operations. Construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors, and front-end loaders that temporarily emit other air pollutants, such as precursors of O₃ (i.e., ROG and NO_x), are accommodated in the emission inventories of State and federally required air plans and would not have a significant impact on the CAAQS and NAAQS.

The Air Basin met all NAAQS, and as a result is no longer subject to federal conformity requirements.²⁰ As noted above, the Air Basin is designated as a nonattainment area for the state PM₁₀ and O₃ standards.

²⁰ Monterey Bay Unified Air Pollution Control District. CEQA Air Quality Guidelines. February 2008.

Consistency with the AQMP is used by MBARD to determine a project's cumulative impact on regional air quality (i.e., ozone levels). Projects that are not consistent with the AQMP have not been accommodated in the AQMP and will have a significant cumulative impact on regional air quality unless emissions are totally offset. For localized impacts, the threshold for cumulative impacts is 82 pounds per day of PM₁₀. For localized CO, MBARD does not have screening levels for intersection traffic that could result in potential CO hotspots; however, several other air districts have established these levels, which are described below to provide context of the magnitude of hourly volumes that could result in significant localized CO.

- The South Coast Air Quality Management District conducted CO modeling for its 2003 AQMP for the four worst-case intersections in the South Coast Air Basin. At the time the 2003 AQMP was prepared, the most congested intersection had an average daily traffic volume of approximately 100,000 vehicles per day. Using CO emission factors for 2002, the peak modeled CO 1-hour concentration was estimated to be 4.6 ppm. Accordingly, CO concentrations at congested intersections would not exceed 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least more than 100,000 vehicles per day.
- The Bay Area Air Quality Management District determined that projects would result in a less-than-significant impact to localized CO concentrations if project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour, or project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway.)

The Bay Area Air Quality Management District screening criterion of 24,000 vehicles per hour has been applied to the project as a metric to evaluate CO hotspots, since it is the most conservative screening volume.

Health effects from carcinogenic air toxins are usually described in terms of cancer risk. Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various noncarcinogens from the project to published reference exposure levels that can cause adverse health effects. The MBARD recommends an incremental cancer risk threshold of ten in one million. MBARD recommends a Hazard Index of one or more for acute (short-term) and chronic (long-term) effects.

Table 4.3-2: MBARD Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)
ROG and NO _x	137	137
PM ₁₀	82	82
PM _{2.5}	55	55

Notes: ROG = reactive organic gases; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM_{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; CO = carbon monoxide

Source: Monterey Bay Air Resources District. Guidelines for Implementing the California Environmental Quality Act. Revised February 2016.

-
- a) Would the project conflict with or obstruct implementation of the applicable air quality plan?
-

As described in Section 4.3.1.2 Regulatory Framework, MBARD's most recently adopted air quality plan is the 2012 – 2015 AQMP, which was adopted in March 2017. The MBARD Air Quality Guidelines state that project emissions that are not accounted for in the AQMP's emission inventory would result in a significant cumulative impact to regional air quality. Per the Santa Cruz County General Plan/LCP EIR, projects within the County that are consistent with the AQMP's population projections have been properly forecast in the AQMP adopted by AMBAG and are therefore consistent with the AQMP. The proposed project would not increase local population or school enrollment, and is therefore consistent with the AQMP.

Additionally, for construction of a project, exhaust emissions are accounted for in the AQMP emissions inventory, and therefore the project's construction emissions would not result in a significant impact. As discussed under Checklist Question b) below, the project would result in minimal emissions during short-term construction and long-term operations that would not exceed the MBARD thresholds of significance. Therefore, construction and operation of the proposed project would not conflict with or obstruct implementation of the AQMP. **(Less than Significant Impact)**

-
- b) Would the project 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?
-

The Air Basin is considered a non-attainment area for both O₃ (ozone) and PM₁₀ under the California Clean Air Act. As described in Section 4.3.1.2 Regulatory Framework, MBARD adopted the Particulate Matter Plan's list of control measures to reduce ambient levels of particulate matter in the Air Basin. MBARD adopted the Federal Maintenance Plan to maintain the NAAQS for O₃ within the Air Basin. The Federal Maintenance Plan included an emission inventory for ROG and No_x, the two primary O₃ precursor gases. MBARD's AQMP also outlines key programs and rules that will continue to reduce emissions.

Construction

The MBARD CEQA Guidelines provide screening levels for potential significant impacts, and states that projects that are over 2.2 or more acres may be required to implement dust suppression

measures during construction unless construction-emissions modeling indicates that pollutant thresholds established by the MBARD would not be exceeded. As the project would not exceed 2.2 acres of construction ground disturbance, the project would screen out for potential significant construction impacts, consistent with the findings of the Santa Cruz County General Plan/LCP EIR.

Operational Emissions

As discussed in Section 4.3.1.2 Regulatory Framework, mobile source emissions continue to dominate the District's NO_x emissions inventory, and NO_x is an O₃ precursor gas, for which the Air Basin is considered non-attainment. Lower vehicle miles traveled and cleaner exhaust standards for mobile sources remain important factors in reducing regional ROG and NO_x emissions.

Mobile source emissions are associated with new vehicle trips. As discussed in Section 4.17 Transportation, the proposed field lights would shift the timing of games and events into the evening, but the number of attendees at these events is not anticipated to change from existing levels. Therefore, the only increase in vehicle trips as a result of the project would be due to the slight increase in the number of sporting events (one to two additional events per year) that would occur on campus, as the installation of the stadium lights would allow the night football games currently played at other stadiums to be played on the SLV campus instead. This would shift trips already occurring within the Air Basin from other stadiums to the SLV campus. As described in Section 2.2.1 Existing Development, the highest attendance for football games is currently 1,000 attendees for a rivalry or homecoming game, and 500 attendees for most football games. Therefore, there could be a slight increase of people traveling to the SLV campus a few nights per year to attend these events, resulting in a slight increase of vehicle trips. However, these trips already occur within the Air Basin and would be redirected to the SLV campus from other stadiums in the area. Further, the project is local-serving, and it can be reasonably assumed that while the project would slightly increase vehicle trips within the localized area, it would actually reduce the amount of vehicle miles traveled (VMT) because the attendees would no longer be driving further distances to attend night games at other stadiums in the area, and therefore not result in a cumulatively considerable net increase of mobile emissions.

As described further in Section 4.6 Energy, the project would use energy efficient LED lights and would comply with energy and lighting efficiency standards in Title 24. As concluded in the Santa Cruz County General Plan/LCP EIR, compliance with applicable energy standards would result in reduced criteria air pollutants. Therefore, the project would not 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. **(Less than Significant Impact)**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute a cumulatively considerable contribution to a significant cumulative regional criteria

pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. Air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect. As discussed under Checklist Question b), the project would not result in a cumulatively considerable net increase of any criteria pollutant, therefore the project would not have an adverse health effect.

The Bay Area Air Quality Management District screening criterion of 24,000 vehicles per hour has been applied to the project as a metric to evaluate CO hotspots, since it is the most conservative screening volume. As discussed in Section 4.17 under Checklist Question a), peak game attendance would generate 309 inbound trips and 31 outbound trips during the busiest hour of 5:00 P.M. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour and would therefore be considered to have a less than significant on CO hotspots. Further, as discussed in the Santa Cruz County General Plan/LCP EIR, development accommodated by the Sustainability Update would not significantly contribute to a CO hotspot.

Fugitive Dust

Construction of the field lights would occur in the vicinity of sensitive receptors, including residences in nearby neighborhoods and students on campus. Construction activities associated with the project, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site could deposit mud on local streets, which could be an additional source of airborne dust after it dries.

MBARD CEQA Air Quality Guidelines outlines best management practices as feasible mitigation to reduce inhalable particulate emissions. As discussed under Checklist Question b) above, the project screens out of requirements to implement dust suppression measures during construction, as the project would occur over less than 2.2 acres. While the project is not subject to enforcing MBARDs best management practices for reducing inhalable particulate emissions, the project would incorporate the following measures, as feasible, as standard measures to prioritize public health and safety.

Standard Measures:

- Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
- Prohibit all grading activities during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).

- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least two feet of freeboard.
- Cover all trucks hauling dirt, sand, or loose materials.
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as soon as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the MBARD shall be visible to ensure compliance with Rule 402 (Nuisance).
- Limit the area under construction at any one time.

Construction of the lights and PA system is estimated to last six months, and construction of the remainder of the project is estimated to last three to six months. The duration of project construction would be brief and would not involve substantial earthwork or otherwise involve heavy diesel equipment that would emit substantial TACs. Therefore, a health risk model was not deemed necessary for the purpose of this analysis.

The project would have a less than significant impact with regard to fugitive dust emissions. The project would, therefore, not expose sensitive receptors to significant pollutant concentrations.

(Less than Significant Impact)

-
- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
-

Construction activities for the proposed project would generate occasional odors associated with diesel exhaust and construction equipment on site. These emissions would occur during daytime hours only, would be localized, and would be generally confined to the project site. Additionally, the odors would be temporary. During operations, the proposed project would be consistent with the existing uses as a school site, which are not associated with generating odors. Therefore, impacts related to objectionable odors would be less than significant. **(Less than Significant Impact)**

4.4 Biological Resources

The following discussion is based in part upon a Biological Resource Report completed in April 2026 by H.T. Harvey & Associates, and a Mountain Lion Impact Evaluation completed in March 2026 by Live Oak Associates, Inc. The reports are included as Appendix A and Appendix B of this Initial Study, respectively.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To “take” a listed species, as defined by the State of California, is “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Local

Santa Cruz County Riparian Corridor and Wetlands Protection

Santa Cruz County Code Chapter 16.30 includes policy to minimize and eliminate development activities in the riparian corridor, and to preserve, protect, and restore riparian corridors for: protection of wildlife habitat; protection of water quality; protection of aquatic habitat; protection of open space, cultural, historical, archaeological and paleontological, and aesthetic values; transportation and storage of floodwaters; prevention of erosion; and to implement the policies of the General Plan and the Local Coastal Program Land Use Plan. The Code provides criteria for determining development buffers from riparian areas, with a maximum buffer of 50 feet from the riparian corridor.

Santa Cruz County Sensitive Habitat Protection

The purpose of the County's Code Chapter 16.32 is to minimize the disturbance of biotic communities which are rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activity; to protect and preserve these biotic resources for their genetic, scientific, and educational values; and to implement policies of the General Plan and the Local Coastal Program Land Use Plan. An area is defined as sensitive habitat if it is/has:

- Special biological significance as identified by the State Water Resources Control Board.
- Habitat for locally unique biotic species/communities including but not limited to: oak woodlands, coastal scrub, maritime chaparral, native rhododendrons and associated Elkgrass, indigenous Ponderosa Pine, indigenous Monterey Pine, mapped grassland in the Coastal Zone and sand parkland; and special forests including San Andreas Oak Woodlands, indigenous Ponderosa Pine, indigenous Monterey Pine and ancient forests.
- Adjacent to essential habitats of rare, endangered or threatened species.
- Habitat for species of special concern as listed by the California Department of Fish and Game in the special animals list, natural diversity database.

- Habitat for rare or endangered species which meet the definition of Section 15380 of the California Environmental Quality Act guidelines.
- Habitat for rare, endangered or threatened species as designated by the State Fish and Game Commission, United States Fish and Wildlife Service or California Native Plant Society.
- Nearshore reefs, rocky intertidal areas, seacaves, islets, offshore rocks, kelp beds, marine mammal hauling grounds, sandy beaches, shorebird roosting, resting and nesting areas, cliff nesting areas and marine, wildlife or educational/research reserves.
- Dune plant habitats.
- All lakes, wetlands, estuaries, lagoons, streams and rivers.
- Riparian corridors.

Santa Cruz County Significant Tree Protection Ordinance

According to the County's Code Chapter 16.34, no person shall do, cause, permit, aid, abet, suffer, or furnish equipment or labor to remove, cut down, or trim more than one-third of the green foliage of, poison, or otherwise kill or destroy any significant tree as defined in this chapter within the Coastal Zone until a significant tree removal approval for the project has been obtained pursuant to Chapter 13.20 SCCC. Significant tree includes any tree, sprout clump, or group of trees:

- Within the urban services line or rural services line, any tree which is equal to or greater than 20 inches diameter breast height (or d.b.h., approximately five feet in circumference); any sprout clump of five or more stems each of which is greater than 12 inches d.b.h. (approximately three feet in circumference); or any group consisting of five or more trees on one parcel, each of which is greater than 12 inches d.b.h. (approximately three feet in circumference).
- Outside the urban services line or rural services line, where visible from a scenic road, any beach, or within a designated scenic resource area, any tree which is equal to or greater than 40 inches d.b.h. (approximately 10 feet in circumference); any sprout clump of five or more stems, each of which is greater than 20 inches d.b.h. (approximately five feet in circumference); or, any group consisting of 10 or more trees on one parcel, each greater than 20 inches d.b.h. (approximately five feet in circumference).
- Any tree located in a sensitive habitat as defined in Chapter 16.32 SCCC.

4.4.1.2 Existing Conditions

Habitat Onsite

A reconnaissance-level survey was completed by H.T. Harvey in December 2024. The survey only identified one biotic habitat type onsite: landscaped/developed. The vegetation is very limited and comprises predominately of the turf grass on the softball and baseball fields. Scarce trees in the southern portion of the project site include native coast live oak (*Quercus agrifolia*) and white alder (*Alnus rhombifolia*), and vegetation growing on the margins of these fields include nonnative bristly ox-tongue (*Helminthotheca echioides*) and scarlet pimpernel (*Lysimachia arvensis*). The football field is made of artificial grass.

Developed areas of the project site serve as wildlife habitat only in a very limited capacity, and most wildlife species that occur in these areas are tolerant of frequent human disturbances. Common wildlife species that are associated with surrounding developed or forested areas can occur in developed portions of the project site, including the nonnative house mouse (*Mus musculus*), black rat (*Rattus rattus*), and eastern fox squirrel (*Sciurus niger*) as well as the native western fence lizard (*Sceloporus occidentalis*) and striped skunk (*Mephitis mephitis*). Burrowing animals such as the California ground squirrel (*Otospermophilus beecheyi*) and Botta's pocket gopher (*Thomomys bottae*) are also present along the margins of the fields and at the base of some of the outbuildings. A variety of birds including American robin (*Turdus migratorius*), American crow (*Corvus brachyrhynchos*), western bluebird (*Sialia mexicana*), and great blue heron (*Ardea herodias*) may forage on the fields of the project site, and the buildings may be attractive to certain bird species in the area that often nest on human-made structures such as the black phoebe (*Sayornis nigricans*), Bewick's wren (*Thryomanes bewickii*), mourning dove (*Zenaida macroura*), and house finch (*Haemorhous mexicanus*). Birds of prey expected to move through or hunt in the project site area include red-shouldered hawk (*Buteo lineatus*) and Cooper's hawk (*Astur cooperii*).

Common amphibians and reptiles from nearby forested areas such as the Pacific tree frog (*Pseudacris regilla*), California slender salamander (*Batrachoseps attenuatus*), and forest sharp-tailed snake (*Contia longicaudae*) may take refuge in leaf duff under the scattered oak trees in the project site area. Furthermore, larger mammals moving to and from more suitable habitat patches may move across or forage in the fields, such as the native mountain lion (*Puma concolor*), bobcat (*Lynx rufus*), coyote (*Canis latrans*), and black-tailed deer (*Odocoileus hemionus*) as well as the nonnative Virginia opossum (*Didelphis virginiana*). Bats such as California myotis (*Myotis californicus*) and long-eared myotis (*Myotis evotis*) may aerially forage for insects over the fields in the project site area at night, but no suitable roost sites are present within the project site.

Existing Lighting Conditions

Based on observations from the site visit on December 1, 2024, light from existing sources illuminates the project site as well as some adjacent areas. Numerous downward-facing lights are located throughout the project site and nearby areas within the school campus, including pole-mounted lights and lights affixed to school buildings, storage buildings, and other outbuildings.

These lights are generally small and/or limited in the amount of light they cast, typically illuminating doorways, hallways, or resources such as water fountains. Streetlights are also present in parking lots on the Campus outside of the project site. Currently there are no significant (i.e. tall, very bright) sources of light within the project site, such as competition field lights.

Adjacent Habitat

The following habitat types are located within the general vicinity of the project site.

Mixed Redwood Forest

Forested habitat on campus property and an adjacent residential property is located immediately adjacent to the project site to the west and south. This habitat is characterized predominantly by coast redwood as well as Douglas-fir (*Pseudotsuga menziesii*), coast live oak, and tan oak (*Notholithocarpus densiflorus*). The understory of this habitat typically consists of leaf duff; ferns such as western sword fern (*Polystichum munitum*) and western maidenhair fern (*Adiantum aleuticum*); occasional shrubs such as evergreen huckleberry (*Vaccinium ovatum*), poison oak (*Toxicodendron diversilobum*), and wartleaf ceanothus (*Ceanothus papillosus*); and herbaceous natives such as redwood sorrel (*Oxalis oregana*), redwood violet (*Viola sempervirens*), and Pacific trillium (*Trillium ovatum*). Invertebrates found in this habitat include the California sister (*Adelpha californica*), Ceanothus silk moth (*Hyalophora euryalus*), slender banana slug (*Ariolimax dolichophallus*), and San Lorenzo shoulderband snail (*Helminthoglypta exarata*). The forest sharp-tailed snake, a slug-eating specialist, can also be found here.

Forests dominated by redwoods typically support low diversity of bird communities. However, the oaks and other hardwoods found among the redwoods in the vicinity support numerous species in addition to those typical of redwood forests and other listed above, including Steller's jay (*Cyanocitta stelleri*), common raven (*Corvus corax*), pileated woodpecker (*Dryocopus pileatus*), varied thrush (*Ixoreus naevius*), band-tailed pigeon (*Patagioenas fasciata*), pygmy nuthatch (*Sitta pygmaea*), great-horned owl (*Bubo virginianus*), and dark-eyed junco (*Junco hyemalis*). Redwood forest habitat provides suitable foraging and breeding habitat for many of the bird species listed above, as well as mammals such as mountain lion, bobcat, striped skunk, black-tailed deer, western grey squirrel (*Sciurus griseus*), and American shrewmole (*Neurotrichus gibbsii*).

Riparian Woodland

The San Lorenzo River and Fall Creek are located 250 feet east and 0.1 mile southeast of the project site, respectively. Riparian woodland habitat along these waterways is dominated by coast redwood, big-leaf maple (*Acer macrophyllum*), coast live oak, and tan oak rooted above and below the tops of banks. The understory of this habitat typically consists of leaf duff and sparse nonnative annual grasses, with occasional native species such as wartleaf ceanothus (*Ceanothus papillosus*), thimble berry (*Rubus parviflorus*), and western skunk cabbage (*Lysichiton americanus*).

Riparian habitats in California generally support exceptionally rich animal communities and contribute disproportionately to landscape-level species diversity. The presence of seasonal water

and abundant invertebrates provide foraging opportunities for many species, and the diverse habitat structure provides cover and nesting opportunities. Fish species found in these waters include native Sacramento sucker (*Catostomus occidentalis*), federally threatened steelhead, and nonnative largemouth bass (*Micropterus nigricans*) and mosquito fish (*Gambusia affinis*).

Leaf litter provides cover for amphibians such as two California species of special concern – the Santa Cruz black salamander (*Aneides niger*) and California giant salamander (*Dicamptodon ensatus*) – and other native species such as ensatina (*Ensatina eschscholtzii*) and California slender salamander. Several reptiles may also occur here, including the northern alligator lizard (*Elgaria coerulea*), western skink (*Eumeces skiltonianus*), and ring-necked snake (*Elgaria multicarinata*). Mammals such as the California vole (*Microtus californica*), brush rabbit (*Sylvilagus bachmani*), and San Francisco dusky-footed woodrat (*Neotoma fuscipes*) provide a prey base for mesopredators that forage here, such as the bobcat and coyote. Several species of bats, including the hoary bat (*Lasiurus cinereus*), Mexican free-tailed bat (*Tadarida brasiliensis*), and big brown bat (*Eptesicus fuscus*) forage for insects over stream habitats. The mature trees in this habitat may provide potential roosting habitat for various bat species in cavities, tree bark, or branches.

In addition to fish, amphibians, reptiles, and mammals, the reach of Fall Creek and the San Lorenzo River adjacent to the project site provides suitable foraging and breeding habitat for many of the bird species listed above, as well as belted kingfisher (*Megaceryle alcyon*), American dipper (*Cinclus mexicanus*), pacific wren (*Troglodytes pacificus*) and others. Raptors such as red-shouldered hawks (*Buteo lineatus*) and Cooper's hawks nest within riparian corridors and forage there, as well as in adjacent habitats. Bald eagles (*Haliaeetus leucocephalus*) and osprey (*Pandion haliaetus*) have also been observed hunting in San Lorenzo River waters. Riparian habitats are also used heavily by migrant passerines and wintering birds.

Wildlife Movement

Wildlife movement within and in the vicinity of the project site takes many forms and is different for the various suites of species associated with these lands. Bird and bat species move readily over the landscape in the project vicinity, foraging over and within both natural lands and landscaped areas. Mammals of different species move within their home ranges but also disperse between patches of habitat. Generally, reptiles and amphibians similarly settle within home ranges, sometimes moving to central breeding areas, upland refugia, or hibernacula in a predictable manner, but also dispersing to new areas. Some species, especially among the birds and bats, are migratory, moving into or through the vicinity during specific seasons. Aside from bats, there are no other mammal species in the vicinity of the site that are truly migratory. However, the young of many mammal species disperse from their natal home ranges, sometimes moving over relatively long distances in search of new areas in which to establish.

Movement corridors are segments of habitat that provide linkage for wildlife through the mosaic of suitable and unsuitable habitat types found within a landscape while also providing cover. On a broader level, corridors also function as paths along which wide-ranging animals can travel, populations can move in response to environmental changes and natural disasters, and genetic

interchange can occur. In California, environmental corridors often consist of riparian areas along streams, rivers, or other natural features.

The project site—and the campus as a whole—is flanked on most sides by natural, forested areas but is heavily developed. There are no well-defined or important movement corridors for mammals, amphibians, or reptiles on or through the project site itself due to the existing development, lack of cover, and presence of impediments to movement. However, wildlife moves through the heavily forested areas west of the project site, which provides a broad area of connectivity between the Pacific Ocean/Monterey Bay coastline and the vast Santa Cruz Mountains to the north and northwest. In addition, fish and wildlife move along the riparian corridors of Fall Creek (0.1-mile to the southeast, within Henry Cowell Redwoods State Park) and the San Lorenzo River (250 feet to the east). Therefore, although adjacent habitats provide important areas of wildlife movement and habitat connectivity, the footprint of the project site does not.

Special Status Species

Special Status Plant Species

No special status plant species were determined to have any potential to occur on the project site because the project site is occupied entirely by landscaped/developed habitat that does not provide suitable habitat for such plants.

Special Status Animal Species

The following special-status species that are present in specialized habitats in the Santa Cruz Mountains, or that occurred in or near the Santa Cruz Mountains historically but are no longer present, are absent from the project site due to a lack of suitable habitat and/or isolation of the site from populations by urbanization: the Smith's blue butterfly (*Euphilotes enoptes smithi*), Crotch's bumble bee (*Bombus crotchii*), western bumble bee (*Bombus occidentalis*), Ohlone tiger beetle (*Cicindela ohlone*), Mount Hermon June beetle (*Polyphylla barbata*), Zayante band-winged grasshopper (*Trimerotropis infantilis*), tidewater goby (*Eucyclogobius newberryi*), northwestern pond turtle (*Actinemys marmorata*), California tiger salamander (*Ambystoma californiense*), Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*), red-bellied newt (*Taricha rivularis*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), marbled murrelet (*Brachyramphus marmoratus*), yellow rail (*Coturnicops noveboracensis*), burrowing owl (*Athene cunicularia*), yellow warbler (*Setophaga petechia*), grasshopper sparrow (*Ammodramus savannarum*), loggerhead shrike (*Lanius ludovicianus*), American badger (*Taxidea taxus*), and ringtail (*Bassariscus astutus*). While bald eagles (*Haliaeetus leucocephalus*) may fly over the project site at times, none are expected to nest or forage on or close to the project site.

No aquatic habitats to support special-status fish species are present in the project site. San Lorenzo River and Fall Creek, located 250 feet to the east and 0.1 mile to the southeast, respectively, supports anadromous special-status fish species, including the federally threatened Central California Coast steelhead (*Oncorhynchus mykiss*) and Pacific lamprey (*Entosphenus*

tridentatus), a California species of special concern. These streams may also potentially support the federally and state threatened Central California Coast coho salmon (*Oncorhynchus kisutch*). The mountain lion (a candidate for listing under CESA); the monarch butterfly (*Danaus plexippus*), which is proposed for listing under FESA; the western red bat (*Lasiurus blossevillei*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and nesting Vaux's swift (*Chaetura vauxi*), which are California species of special concern; and the state protected golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*) may also forage in the project site. These species are not expected to den, roost, or breed on or immediately adjacent to the project site due to a lack of suitable habitat.

The California giant salamander (*Dicamptodon ensatus*), Santa Cruz black salamander (*Aneides niger*), olive-sided flycatcher (*Contopus cooperi*), and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) can potentially breed or occur on or immediately adjacent to the project site.

Further details on the legal status and likelihood of occurrence of special-status animal species known to occur, or potentially occurring, in the surrounding region are presented in Table 2 of Appendix A.

Sensitive Natural Communities

No sensitive natural communities are located on the project site.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) 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 (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

-
- a) Would the project 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 CDFW or USFWS?
-

The improvements proposed under the project would occur entirely in landscaped/developed habitat and would not impact natural habitats nor convert natural habitats to landscaped/developed habitat.

Construction Impacts

Water Quality and Special-Status Fish

No direct impacts to the San Lorenzo River, located 250 feet east of the project site, and Fall Creek, located 0.1 mile southeast of the project site would occur. However, because the San Lorenzo River and Fall Creek are located downslope of the project site, there is some potential for the project to result in indirect impacts on water quality as runoff travels across and leaves the site and ultimately is received by those waters. Project activities could potentially impact the Central California coast steelhead, Central California coast coho salmon, and Pacific lamprey, if present in Fall Creek and San Lorenzo River, due to a temporary increase in erosion, sedimentation, and turbidity in aquatic habitats located downstream of the work area. Additionally, minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downslope and downstream of construction activities. Indirect impacts, as described above, would be avoided through implementation of a Storm Water Pollution Prevention Plan (SWPPP), as discussed in Section 4.10.2, which would minimize increases of peak discharge of storm drain water and reduce runoff of pollutants. The SWPPP would include erosion control measures, sediment control measures, temporary water drainage control measures, and site housekeeping requirements for construction materials, waste management, vehicle storage

and maintenance, and landscape materials.²¹ Implementation of the SWPPP would minimize the potential for impacts on water quality due to increases in erosion, sedimentation, and turbidity as well as releases of pollutants into Fall Creek and San Lorenzo River located downslope of the project site. Therefore, project activities would not result in substantial adverse indirect effects on water quality or special-status fish, and such impacts would be less than significant.

Nesting Birds

While the project does not propose removal of trees, construction during the nesting season (February 1 through August 31) could potentially cause nest abandonment.

Impact BIO-1: Future construction activities associated with build out under the Plan could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.

The project would implement the following mitigation measure to prevent the loss of fertile eggs, impacts to nesting raptors or other migratory birds, or nest abandonment.

MM BIO-1.1 **Avoid Nesting Birds.** To the extent feasible, demolitions and construction activities shall be scheduled between September 1st and February 1st in order to avoid the nesting season. If this is not practical, a qualified biologist shall conduct pre-activity surveys for nesting birds. Nesting bird surveys shall be conducted no more than seven days prior to onset of any ground disturbance or vegetation removal at the project site. If active bird nests are observed by the biologist within the areas to be disturbed, the biologist shall determine an appropriate buffer around the nest where demolition or grading activity shall be postponed until the biologist determines all young have fledged the nest (typically 300 feet for raptors and 100 feet for other species) to ensure that no nests of species protected by the Migratory Bird Treaty Act and California Fish and Game Code are disturbed during project implementation. If it is not practical to set a buffer zone, then work in the vicinity of the active bird nest (e.g., 50 feet for passerines, up to 200 feet for raptors), shall be postponed until the biologist determines that all young have fledged the nest and that construction will not result in death or injury to nestlings.

With implementation of Mitigation Measure MM BIO-1.1 described above, the project would not result in impacts to nesting birds by ensuring no construction work takes place in or near their habitat.

²¹ County of Santa Cruz Planning Department. Construction Site Stormwater Pollution Control BMP Manual. October 2011.

Nonbreeding Special-Status Invertebrates, Birds, and Roosting Bats and Other Mammals

Several special-status bird and mammal species may occur on the project site as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the project impact area. These species include the monarch butterfly, Vaux's swift, golden eagle, white-tailed kite, mountain lion, pallid bat, Townsend's big-eared bat, and western red bat.

Few, if any, monarch butterflies are expected to be present on the project site given the developed nature of the habitat, lack of milkweeds, lack of high-quality floral resources to support foraging individuals, and lack of any evidence that an overwintering site is present nearby. The Vaux's swift may breed in the vicinity of the project site in cavities and large snags in old-growth forests, as well as chimneys in nearby neighborhoods. The project site lacks suitable nesting habitat for this species, but it may occur as a forager over the project site throughout the year. The golden eagle is known to occur in the project vicinity as a breeder, including at Henry Cowell Redwoods State Park, but would not breed on the project site due to lack of sufficient prey-base and high human disturbance. The species may occur as an occasional forager on the project site. The white-tailed kite infrequently occurs in the project vicinity but is more common in lower elevation areas along the coast and could occur on the project site as an infrequent forager, but is not expected to breed.

The large coast live oak trees and coast redwood trees in the forested lands west of the project site provide suitable roosting habitat for common bat species such as the Yuma myotis (*Myotis yumanensis*), California myotis (*Myotis californicus*), long-eared myotis (*Myotis evotis*), big brown bat (*Eptesicus fuscus*), hoary bat (*Lasiurus cinereus*), and Mexican free-tailed bat (*Tadarida brasiliensis*) as well as three California species of special concern: the pallid bat, Townsend's big-eared bat, and western red bat. There are no large cavities capable of supporting large roosts, or maternity roosts, of special-status or common bats in or adjacent to the project site. The pallid bat and Townsend's big-eared bat (both California species of special concern) may occur as occasional foragers on the project site, and the pallid bat may roost in small numbers in the nearby forested areas, but neither species are known to breed in areas adjacent to project site. The western red bat (a California species of special concern) may also roost in small numbers in trees in or adjacent to the project site in winter or during migration, but it is not expected to roost in large numbers and does not breed in the project region.

Activities under the project would have some potential to impact foraging habitats and/or disturb small numbers of individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would move away from any construction areas or equipment before they could be injured or killed. Further, the project site itself does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, construction of the project will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant.

Nesting Olive-sided Flycatcher

The olive-sided flycatcher (a California species of special concern while nesting) may nest in mixed redwood forest found south and west of the project site. Based on site observations, the areal extent of suitable habitats on and adjacent to the project site, and known nesting densities of this species, no more than one pair of olive-sided flycatchers could potentially nest immediately adjacent to the project site. The project would not result in the permanent loss of suitable nesting and foraging habitat for the olive-sided flycatcher. However, construction activities that occur during the nesting season and cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests (i.e., nests with eggs or young). Heavy ground disturbance, noise, and vibrations caused by project construction activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs that could be disturbed by construction is very small (i.e., one pair), the impacts of project activities would represent a very small fraction of the regional populations of these species. Therefore, neither the potential loss of individual olive-sided flycatchers, nor the disturbance of nesting and foraging habitat, would have a substantial adverse effect, and these impacts would thus not constitute a significant impact on these species or their habitat. However, all native migratory birds, including olive-sided flycatchers, are protected under the MBTA and California Fish and Game Code. The project would implement Mitigation Measure MM BIO-1.1 described above to protect nesting birds during project construction.

San Francisco Dusky-Footed Woodrat

One nest of San Francisco dusky-footed woodrats was detected during the December 2024 site visit in a coast live oak within mixed redwood forest approximately 0.15 mile north of the project site. Therefore, this species is considered present in the mixed redwood forest directly adjacent to the south and west of the project site. Five to six pairs of this species are estimated to nest immediately adjacent to the project site. Construction of the project site could result in the disturbance or destruction of nests and young, leading to increased predation risk on woodrats flushed from nests, as a result of operation of equipment.

Although woodrats are abundant in the project vicinity, they are very important ecologically, as they provide an important prey source for raptors (particularly owls) and for predatory mammals, and their nests also provide habitat for a wide variety of small mammals, reptiles, and amphibians. However, no nests of the San Francisco dusky-footed woodrat were detected in any of the proposed field light locations or other areas that may be affected by construction of the project. Therefore, impacts of construction of the project on woodrats and their nests would be considered less than significant.

California Giant Salamander and Santa Cruz Black Salamander

There is low potential for the California giant salamander or Santa Cruz black salamander to occur on the project site when construction occurs; therefore, the project is unlikely to impact this

species. However, the possibility that a small number of individuals could occur on the project site cannot be eliminated. Individuals, if present, could be directly impacted by construction activities associated with the project. Individuals may be crushed by foot traffic, vehicles, or equipment, or crushed, trapped, and/or suffocated in their refugia by the passage of heavy equipment. An increase in native and nonnative predators attracted to the project site due to trash left on the work site might temporarily result in increased mortality of individuals of these species. Because project activities will be limited to landscaped/developed habitat and no impacts on these species' primary habitats (i.e., rocks and woody debris along Fall Creek or San Lorenzo River, aquatic habitat in Fall Creek or San Lorenzo River, clay or silty soils in unshaded upland areas) would occur, the number of individuals that could be impacted by the project is extremely small (i.e., one or two individuals of each species, at most). These impacts would represent such a small proportion of the species' regional populations and therefore would not have a substantial adverse effect.

Minor spills of petrochemicals, hydraulic fluids, and solvents may occur during vehicle and equipment refueling. Such leaks/spills could adversely affect water quality downstream of construction activities, potentially impairing the health of eggs or larvae along Fall Creek or San Lorenzo River. However, potential indirect impacts on habitat and individuals due to a reduction in water quality would be avoided and minimized through implementation of a Storm Water Pollution Prevention Plan (SWPPP), as discussed above and in Section 4.10. For these reasons, project impacts on individual California giant salamanders or Santa Cruz black salamanders would be less than significant.

Mountain Lion

A Mountain Lion Impact Evaluation was completed (see Appendix B) to evaluate project impacts on mountain lions. The Mountain lions occurring near the project site are part of the Central Coast North Evolutionary Significant Unit (CC-N ESU). The CC-N ESU includes mountain lions found within the counties of Alameda, Contra Costa, San Mateo, Santa Clara, and Santa Cruz. Because mountain lions in the Santa Cruz Mountains comprise the core of this ESU, the Biological Resource Report completed for the project (see Appendix A) analyzes impacts to mountain lions in the context of the Santa Cruz Mountains subpopulation, which consists of approximately 50 mountain lions.

Mountain lions are known to occur in the general vicinity of the project site and adjacent forested areas, and up to several mountain lions at a time may have overlapping territories that include the project site area. Specifically, the average home range of a female cougar in the region is about 18.5 square miles, or approximately 11,840 acres. Females tend to utilize their home ranges to a greater degree than a male, as females are often pregnant or with young. Therefore, when discussing the probability of a mountain lion occurring in the project vicinity, this analysis assumes a female mountain lion home range. How mountain lions use their range is largely dependent on numerous factors (e.g., prey abundance, vulnerability of prey, human density roads, etc.) To determine the probability a mountain lion would be adjacent to the project site at any given moment, the Mountain Lion Impact Evaluation divided the average home range of a single mountain lion into 100-acre blocks, which would result in approximately 118, 100-acre blocks per mountain lion, each measuring 2,087 feet per side. Therefore, two, 100-acre blocks would be located along the project

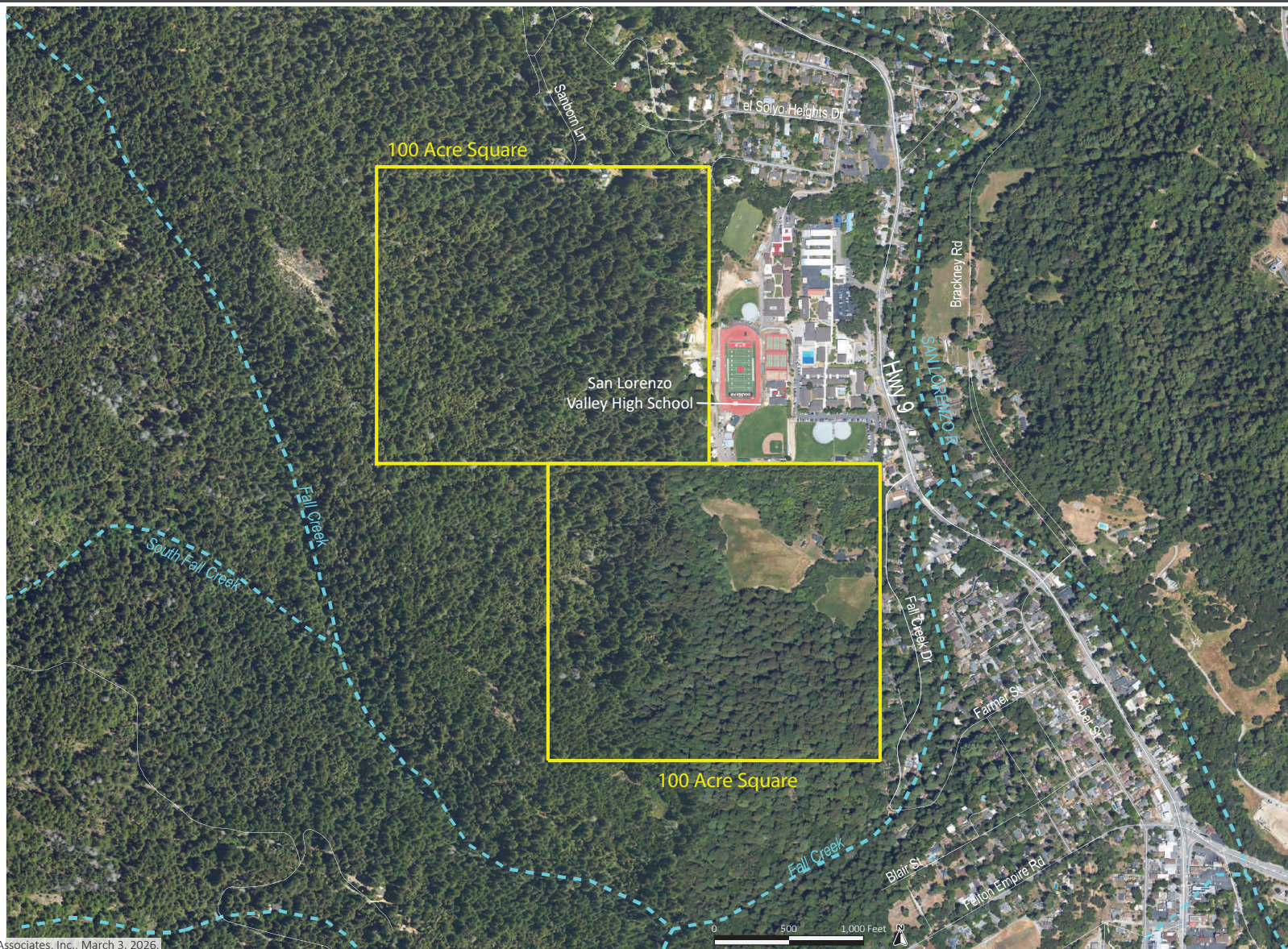
site boundary (see Figure 4.1-1). If the entire home range of each mountain lion is assumed to be homogenous, meaning the average mountain lion utilizes all blocks of their home range equally and that the probability of the mountain occurring on any day is equal across all blocks, we could then assume that each 100-acre block would be visited with a mountain lion at least three days per year ($365/118 = 3.09$ days). This visit would not simply be moving through the block (as mountain lions can travel several miles in a day) but would mean the mountain lion spends significant time hunting or resting.

However, if a mountain lion occurs in a block greater than chance alone (three times a year), the Mountain Lion Impact Evaluation infers that the mountain lion is therefore selecting the block, whereas if a mountain lion occurs in a block statistically less than chance alone, then the mountain lion is avoiding the block. This assumption would mean that if a mountain lion spent nine days a year (three times the baseline homogenous chance of three days per year) in one of the two blocks adjacent to the school, the mountain lion would be statistically selecting the block over other blocks within their territory. Given the high human occurrence of the two blocks adjacent to the school, it is unlikely that these two blocks would support sufficient resources that cause a mountain lion to statistically select them over blocks occurring at further distances. However, to be conservative, the Mountain Lion Impact Evaluation assumed a mountain lion would occur in each block nine days per year (18 days collectively for the two blocks adjacent to the school).

Mountain lions are known to be the most active between dusk and dawn, however, female mountain lions are more active during the day than males, possibly to avoid males that may kill them or their kittens. During construction, mountain lions may avoid natural areas adjacent to the project site due to increased noise. Research in Los Angeles found that in areas of high human activity, mountain lions shifted their activity to the night to avoid people.

Project impacts to mountain lions were evaluated in detail by Live Oak Associates, Inc. (see Appendix B). The analyses determined that construction impacts on mountain lions would not be substantial because as a low-density species, mountain lions would occur in adjacent habitats very infrequently. Since mountain lion activity patterns are mostly crepuscular (active primarily during the twilight period) but may become nocturnal when they move closer to development, mountain lion activity would not overlap much with daylight hours when construction would occur²². Additionally, construction noise would drop greatly with increasing distance from the construction site, such that mountain lion avoidance of the areas adjacent to the construction site would diminish to less than significant levels at approximately 600 feet from the project site. Although female mountain lions and kittens could be present during daytime construction, research suggests that female mountain lions may be less averse to movement in areas of more dense development, and so would be less affected by construction noise. Furthermore, female mountain lions and kittens found within these areas are already accustomed to a moderate amount of noise from school activities. Therefore, temporary construction impacts on mountain lions would be considered less than significant.

²² Construction activities would only occur during weekdays between 7:00 a.m. and 6:00 p.m. and on Saturdays between 9:00 a.m. and 6:00 p.m.



Source: Live Oak & Associates, Inc., March 3, 2026.

MOUNTAIN LION HOME RANGE 100 ACRE BLOCKS ADJACENT TO PROJECT SITE

FIGURE 4.4-1

Operational Impacts

Increased Lighting

The intensity, spectral quality (i.e., the distribution of blue, green, red, and other portions of the light spectrum emitted by a light source), duration, and periodicity of exposure to light are known to affect the biochemistry, physiology, and behavior of organisms. Many animals are extremely sensitive to light cues, having evolved behavioral and/or physiological responses to natural variations in light levels resulting from the day–night cycle, the cycle of the moon, and the seasonal light cycle. Responses can affect processes as diverse as growth, metabolism, patterns of movement (e.g. migration), feeding, breeding behavior, molting, and hibernation.

Artificial lighting has been shown to increase the nocturnal activity of predators like owls, hawks, and mammalian predators. In addition, it has been found to affect the composition of the invertebrate community present in the area, and some bat species have been found to congregate around artificial light sources because of the high numbers of flying insects they attract. The presence of artificial light may also influence habitat use by rodents, and by breeding birds by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality.

While it is generally known that adverse effects of lighting on wildlife can be influenced by the temperature and wavelength of light, peer-reviewed scientific studies provide conflicting results with respect to the degree and type of effects of lighting temperatures and/or wavelengths on various species of plants and animals. A review of the effects of LEDs on terrestrial wildlife for the California Department of Transportation concluded that many species are less sensitive to longer wavelengths/higher-temperature LEDs, but responses vary among species and taxonomic groups, and the diversity of responses of terrestrial wildlife species to lighting temperatures is too large to provide a single recommendation for an ideal lighting spectral composition. Nevertheless, the International Dark-Sky Association, the American Bird Conservancy, and other organizations currently recommend using lighting with a color temperature of 3,000 Kelvin and lower, or ideally 2,700 Kelvin and lower, because cooler/bluer light (defined as 3,000 Kelvin and greater) has a stronger negative effect on plants and animals compared to warmer/redder lights (defined as 2,700 Kelvin and lower).

Proposed Lighting Conditions

The project would result in the construction of field lights that would increase the amount of lighting on and immediately adjacent to the project site. No up-lighting is proposed in the project design, and the field lights will be shielded to attenuate any unwanted up-lighting. This lighting will minimally spill into adjacent natural areas at a distance of up to 200 feet, thereby resulting in an increase in lighting compared to existing conditions. Areas to the north and southeast are developed areas in Felton that do not support sensitive species or sensitive habitats. However, the mixed redwood forest on Campus property to the west and on a property zoned timberland preserve with residence to the south, as well as riparian woodland habitats along the San Lorenzo River to the east and Fall Creek to the southeast, provide suitable habitat for a variety of wildlife

species including riparian bird communities and sensitive species such as the olive-sided flycatcher and San Francisco dusky-footed woodrat, and are close enough to the project site to potentially be affected by an increase in lighting.

The approximate boundary of light spillage is shown in Figure 4.1-7. Within the playing surface of the football field, the maximum illuminance from the outdoor lights would reach approximately 56 footcandles (fc) over ambient light conditions. In the brightest spots of the baseball and softball fields, illuminance would reach a maximum of 63 fc. Due to the directed nature of the proposed lights and effective minimization of glare, the amount of light significantly decreases with distance from each field, such that the point at which there is zero illuminance from the proposed lights is approximately 48–200 feet away from proposed light fixtures in the project site. Therefore, none of the lights would increase illuminance on the sensitive habitats of Fall Creek or the San Lorenzo River, but there would be an increase in illuminance within a portion of the mixed redwood forest south and, to a lesser extent, west of the project site.

Illuminance within the adjacent mixed redwood forest from the proposed field lights would have a maximum value of 2.6 fc over ambient light conditions at the southern boundary of the Campus immediately adjacent to the playing fields. Because illuminance declines with increasing distance, the amount of light reaching into the forest would be reduced to 0 fc at approximately 95 feet south and 99 feet west of the school fence. As a result, an approximately 2.3-acre portion of the forest will receive anywhere from 0.1 to 2.6 fc of illumination above ambient light conditions from the new field lights. During the school year, the field lights are proposed to operate five days per week from Monday through Friday until 8:30 p.m., which would extend from 0–0.5 hour past sunset in summer and 3.5 hours past sunset in winter. During the school year, the field lights would also operate during up to 12 annual events that last until 10:00 p.m., which would extend from 1.5 hours past sunset in summer and 5 hours past sunset in winter. Field lights would operate when school is not in session. Therefore, wildlife in this area would be exposed to 0.1–2.6 fc of illuminance above existing dark conditions for 0.5–5 hours per day on approximately 60% of days in the year.

Anticipated Impacts of the Proposed Field Lights on Wildlife

The proposed lighting is consistent with International Dark-Sky Association design guidance for outdoor sports lighting, although the temperature of light that will spill into the mixed redwood forest habitat (5,700 K) exceeds the International Dark-Sky Association's recommendations for lighting in wildlife habitat areas ($\leq 3,000$ K).

Although the approximately 2.3-acre area of mixed redwood forest that would be subject to increased illuminance by the project is connected to protected lands of Henry Cowell Redwoods State Park, special-status wildlife is not reasonably expected to rely heavily on this area, as described in detail above under construction impacts. As described above under construction impacts, a maximum of one pair of breeding olive-sided flycatchers and five to six pairs of San Francisco dusky-footed woodrats, both California species of special concern, are expected to occur and potentially nest in forested edges near the project site. Other special-status animals that could occasionally move through and/or forage within this area in small numbers, but are not expected to breed there, are the monarch butterfly, California giant salamander, Santa Cruz black salamander, golden eagle, white-tailed kite, Vaux's swift, pallid bat, Townsend's big-eared bat, and western red bat (mountain lion is addressed separately below). In addition, common wildlife species such as birds, bats and other mammals, reptiles, and amphibians will use this area for foraging, shelter, and potentially for breeding. However, this approximately 2.3-acre area is not subject to use by large numbers of individuals of any one species and does not represent core habitat that is relied upon by any one population. As a result, only small numbers of individuals, and a small area of moderate-quality habitat, would be affected by project lighting, and project lighting would not result in population-level effects or the extirpation of wildlife species from local communities.

In addition, the approximately 2.3-acre area of mixed redwood forest that would be subject to increased illuminance by the project is located at the urban/wildland interface. Any wildlife species using the approximately 2.3-acre area may also use surrounding urban/wildland interface areas, and therefore these animals would be habituated to some existing levels of illuminance associated with surrounding urban light sources in Felton and along Highway 9. This habituation is expected to reduce the effects of project lighting on local wildlife species, as any individuals inhabiting the surrounding area are more likely to continue to use the affected once it is lit, due to their habituation.

In considering these combined factors, project impacts due to adverse effects of project lighting on wildlife (except mountain lions, which are addressed below) would be less than significant, as population-level effects and community-level effects would not occur, and protected or especially sensitive habitats (i.e., at Henry Cowell Redwoods State Park, along Fall Creek, or along the San Lorenzo River) would not be affected.

Increased Noise, Human Activity, and Nighttime Vehicular Traffic

The existing PA system consists of three loudspeakers attached to the football stadium press box on the eastern bleachers and two speakers at each baseball and softball announcers' booths. The

project would replace and operate upgraded PA speakers in these locations and would not increase the number of speakers or place them in new areas of the campus. The project would comply with local noise ordinances regarding operation of the new PA system, including Santa Cruz County noise ordinance 8.30.10 defining noise as offensive in excess of 75 decibels at the edge of the property line (Santa Cruz County 2024). Play-by-play commentary would only be permitted during football games, and all other uses of the PA system during competitions would be limited to announcements, warm-up music, or similar uses without running commentary. In addition to sound broadcast over the PA system, sound from the crowd, referees' whistles, bands, and athletes would contribute to the noise that occurs during athletic events. The amount of noise related to a single competition would not increase compared to current levels, but there would be a temporal shift (i.e., games played later in the evening after sunset). In addition, the number of games held on-site would increase with the installation of the field lights, as evening games currently are held off-site due to the lack of field lights, thereby increasing human activity and associated vehicular traffic at night. Therefore, the following discussion addresses the impacts of the temporal shift and increase in noise, human activity, and vehicular traffic, particularly at night, on wildlife.

Animals are adapted to the natural sounds in their environment, either from abiotic (e.g., wind, rain) or biotic (other animals) sources. Natural sounds provide information to wildlife to assess threats, find food, locate mates, and navigate terrain. Wildlife are adapted to these natural sounds but are not as well-adapted to anthropogenic noise. Wildlife exposed to high levels of noise in the short term may experience increased stress responses that impact their ability to conduct routine behaviors, while wildlife exposed to similarly loud noises repeatedly may experience permanent impairment and possibly loss of hearing. Animals may alter their behavior due to noise, becoming more vigilant of predators where sounds are masked and reducing time spent foraging and hunting in areas due to fear of encountering humans.

An increase in nighttime traffic can affect wildlife in direct ways, such as by collisions or roadkill, and indirect ways such as behavioral changes. Sensitive species such as bobcat, coyote, and grey fox (*Urocyon cinereoargenteus*) may avoid areas with higher traffic volume and other high noise areas. Noise from roads can also impact wildlife in adjacent habitats. Wildlife that may already be shifting their activity to times with less human noise and activity, i.e. at night, may be exposed to more disturbance with the temporal shift in use of the athletic fields.

In addition, the increase in human activity such as foot traffic and vehicular traffic at night may cause an increase in mortality in crepuscular and nocturnal wildlife that may be moving across the parking lots, walkways, or roads. Typical attendance for a football game can range from 500 up to 1000 people, and approximately 200 people for baseball and softball games. Attendance and vehicular traffic for a single competition is not expected to increase due to project activities, but there would be an increase in games occurring at night, increasing the risk of collision with nocturnal animals, especially on rainy nights when visibility is further decreased. Wildlife that may be navigating across these areas at night, particularly small mammals, amphibians, and reptiles, may experience direct impacts of increased human activity and vehicular traffic related to night games as they are harder to see and subsequently avoid. As discussed above, there is a low potential for the California giant salamander or Santa Cruz black salamander, both California species

of special concern, to occur on the project site, however, the possibility that a small number of individuals could occur on the project site cannot be eliminated. Individuals, if present, could be directly impacted by increased human activity associated with nighttime competitions, particularly because they are mostly nocturnal and are often moving on damp or rainy nights when human visibility is poor. Individuals may be crushed by foot traffic, vehicles, or equipment, or crushed, trapped, and/or suffocated in their refugia by the passage of competition equipment. Similarly, other common nocturnal wildlife species such as the raccoon may experience a small increase in roadkill.

The increased noise, human activity, and vehicular traffic may affect up to one pair of nesting olive-sided flycatcher and five to six pairs of dusky-footed woodrat occurring in the mixed redwood forest habitat adjacent to the project site, as well as occasional small numbers of California giant salamander, Santa Cruz black salamander, golden eagle, white-tailed kite, Vaux's swift, and a number of common and special-status roosting bats. This increase in noise and human activity may also affect common animal species. These potential impacts overall would not result in a substantial impact to any one species given the small number of individuals potentially affected and the affected habitat being of marginal quality for these species. The disturbance from nighttime competitions may cause dispersing animals to avoid areas where increases in noise and human activity occur, but such areas are very limited in extent, as indicated on Figure 4.4-1, and they are located at the urban/wildland interface rather than in core habitat that would be used heavily by animals for dispersal. Furthermore, potential impacts from these disturbances would not cause any local extirpation, given their relatively low potential to occur in the impacted area and much higher quality habitat found elsewhere in the region, such as Henry Cowell Redwoods State Park Fall Creek Unit to the west or Quail Hollow Ranch to the northeast.

In summary, increased noise, human activity, and vehicular traffic from the proposed field lights, PA system, and subsequent shift to nighttime competitions would not have a substantial impact on wildlife (further discussion of impacts to mountain lions is addressed below) in or adjacent to the project site, and such impacts are therefore less than significant impact.

Mountain Lions

Mountain lions in the Santa Cruz Mountains have been shown to respond negatively to the sound of human voices. A study within Santa Cruz, Santa Clara, and San Mateo Counties found that mountain lions reacted in a significantly stronger way when experimentally exposed to recordings of human noise compared to recordings of Pacific tree frog while feeding on a carcass. Mountain lions may also avoid natural areas that are illuminated by field lights at night. Research has shown that when mountain lion territories include areas with high levels of artificial light at night, they do still hunt in them but prefer to make kills in the darkest places within them.

Mountain lion population in the Santa Cruz mountains has been heavily fragmented by development, especially Highway 17 and other heavily trafficked roads. Vehicle collisions are an issue impacting the population, as the Santa Cruz Puma Project found that among 65 adult and subadult individuals GPS-collared between 2009-2020, five died due to vehicle collisions.

As discussed above under Construction Impacts, the Mountain Lion Impact Evaluation (see Appendix B) conservatively determined a mountain lion would select the two, 100-acre block portions of their overall 11,840-acre home range adjacent to the project site (see Figure 4.4-1) up to 18 days per year. The Mountain Lion Impact Evaluation used this occurrence rate to calculate the probability that a mountain lion's occurrence within the two adjacent blocks would coincide with an event proposed under the project and determined the likelihood of co-occurrence during one event per year would be 65 percent, but it would drop precipitously to 30 percent for two events per year; 5.5 percent for three events per year; and less than one percent for four events per year.

The Mountain Lion Impact Evaluation determined that impacts due to increased lighting and noise during nighttime events would not be substantial due to the low population density of this species, limited number of nighttime events, and resulting low likelihood of mountain lion and nighttime event co-occurrence. Since mountain lions already must use avoidance behavior under existing conditions, impacts due to increased light and noise at night would not rise to the level of a significant impact.

Just as the low likelihood of mountain lions co-occurring during nighttime events resulted in impacts due to noise and light being considered very low, the Mountain Lion Impact Evaluation found that impacts due to road mortality would not be substantial for this same reason. The largest change in traffic due to the installation of field lights would occur during a football homecoming game, which would result in an increase of approximately 309 inbound trips and 31 outbound trips at 5:00 pm. Mountain lions would only occur within approximately two 100-acre blocks adjacent to the project site on 18 days per year, and the chances of mountain lion co-occurrence with the homecoming event would only be approximately 4.8%. Therefore, impacts to mountain lions would be less than significant.

Based on the analysis provided above, the project would not 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 (CDFW) or United States Fish and Wildlife Service (USFWS). **(Less than Significant Impact with Mitigation Incorporated)**

-
- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?
-

The CDFW defines sensitive natural communities and vegetation alliances using NatureServe's standard heritage program methodology (see Appendix A for additional details). Aquatic, wetland, and riparian habitats are also protected under applicable federal, state, or local regulations, and are generally subject to regulation, protection, or consideration by the USACE, RWQCB, CDFW, and/or the USFWS.

San Lorenzo River and Fall Creek flow from north to south and west to east, respectively, adjacent to, but not through, the project site. The entirety of ground-disturbing project impacts will occur outside of the riparian corridor for these streams; thus, the project will have no direct permanent or temporary impacts on riparian habitat. The project will implement a SWPPP, as discussed above under Impact Discussion a) and in Section 4.10, therefore reducing potential indirect effects from runoff to riparian areas downslope of the project site.

No other sensitive natural communities are located on the project site or would be affected by the proposed project. **(Less than Significant Impact)**

-
- c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?
-

No wetlands or other waters of the U.S./state are present on the project site. San Lorenzo River, located 250 feet east of the project site and Fall Creek, located 0.1 mile southeast of the project site, both support other waters of the U.S./state but do not support wetlands. The project would avoid all direct impacts on state or federally protected aquatic habitats within these streams.

Because San Lorenzo River and Fall Creek are located downslope of the project site, there is some potential for the project to result in indirect impacts on other waters of the U.S./state within these streams. However, the project will implement a SWPPP, as discussed above under Impact Discussion a) and in Section 4.10.2, which would minimize increases of peak discharge of storm drain water and reduce runoff of pollutants. Therefore, project impacts on other waters would be less than significant. **(Less than Significant Impact)**

-
- d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
-

For many species, the landscape is a mosaic of suitable and unsuitable habitat types. Environmental corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

San Lorenzo River, Fall Creek, and the associated riparian corridors provide an important movement pathway for both aquatic and terrestrial wildlife species, connecting natural areas in the project vicinity. Songbirds that migrate along the Pacific Flyway disperse and forage along San Lorenzo River and Fall Creek in low to moderate numbers. Common, urban-adapted species such as raccoons and striped skunks may use the vegetation along the streams to move north and south and east and west through the Santa Cruz Mountains. Small mammals, such as mice and shrews, will also use this vegetation to move between habitats. The forest found within the Henry Cowell Redwoods State

Park Fall Creek Unit provides important movement pathways for the olive-sided flycatcher and numerous other common and special-status mammals, birds, bats, and amphibians. Common species of reptiles and amphibians, such as Pacific chorus frogs and alligator lizards, amongst other species, are also expected to move along this corridor adjacent to the project site. The proposed construction of light poles and other elements of the project will not result in any loss of aquatic, wetland, or riparian habitat along San Lorenzo River or Fall Creek or in any substantial reduction in the value of the stream corridors for wildlife movement. Project development would not result in loss of mixed hardwood forest within Henry Cowell Redwood State Park Fall Creek Unit.

The project would, however, result in an increase in light, noise, human activity, and vehicular traffic to the project site and surrounding areas. As discussed under Impact Discussion a) above, increases in such disturbances can cause wildlife to change their behavior, particularly in the way they move through an area. Increased light and noise may cause dispersing animals to avoid areas where such increases occur, but these areas are very limited in extent, as indicated in Figure 4.4-1, and they are located at the urban/wildland interface rather than in core habitat that would be used heavily by animals for dispersal. Furthermore, potential impacts to movement would not cause any local extirpation, given species relatively low potential to occur in the impacted area and much higher quality habitat found elsewhere in the region, such as Henry Cowell Redwoods State Park Fall Creek Unit to the west or Quail Hollow Ranch to the northeast.

Therefore, aquatic and terrestrial species would continue to be able to move north to south along San Lorenzo River and Fall Creek and/or through Henry Cowell Redwood State Park Fall Creek Unit following completion of the project, without any substantial reduction in such movement. As a result, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and this impact is determined to be less than significant. **(Less than Significant Impact)**

-
- e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
-

Removal of Ordinance-Sized Trees

No trees are proposed for removal as part of the project. Therefore, there are no potential impacts related to conflicts with local policies or ordinances protecting trees.

Encroachment into the Stream/Riparian Corridor

To protect the ecological functions and values of a stream, buffers are often prescribed between new development and the stream (or its banks or associated riparian habitat). These buffers provide habitat for plants and animals associated with the stream, provide habitat connectivity (i.e., areas used for wildlife movement, including flight paths for birds), reduce indirect effects of adjacent development (e.g., noise, lighting, human activity, or invasive species) on the natural stream and riparian habitats, allow for the possible future expansion of natural habitat, help to

maintain site hydrology, and in some areas allow for runoff to be treated (e.g., by flowing through vegetated areas) before it enters the stream. In addition, vegetative communities within stream buffers may provide important refugia for animals associated with wetland and riparian habitats along the creek during flood events, when little to no such refugia may be present within the banks of the creek itself. In general, larger buffers protect more of the ecological functions and values of the stream than smaller buffers.

As discussed above, the County's Riparian Corridor and Wetlands Protection Code states that a protected stream setback is present along Fall Creek and extends a horizontal distance of up to 50 feet measured from the top of bank. This setback does not overlap the project site; therefore, the project does not encroach into the riparian corridor, and impacts would be considered less than significant. **(Less than Significant Impact)**

-
- f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?
-

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans. **(No Impact)**

4.5 Cultural Resources

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.²³

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource’s eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

²³ California Office of Historic Preservation. “CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6.” Accessed January 9, 2025.
<https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease, and the county coroner be notified.

Local

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to cultural resources and are applicable to the proposed project:

Policy	Description
ARC-8.1.5	Accidental Discovery of Archaeological Resources. If archaeological resources or human remains are discovered accidentally during grading or construction, the activity shall cease and the property owner shall notify the proper authority in accordance with the Native American Cultural Sites ordinance.
ARC-8.1.6 (LCP)	Environmental Review. Environmental review shall be required for any project with the potential to significantly impact archaeological or tribal cultural resources.

4.5.1.2 *Existing Conditions*

Archaeological Resources

The County of Santa Cruz has defined areas that are sensitive for archaeological resources, some of which might contain unrecorded or undiscovered resources. These areas have a high potential for significant archaeological resources to occur, as determined by both an inventory of known sites in the County, and by geographic attributes based on the topography and geological conditions of the area. Greater sensitivity generally occurs on level to gently rolling hills near the coast or along water courses. These areas of heightened sensitivity occur throughout the County. The area of mapped archaeologically sensitive resource areas in the unincorporated areas of the County totals approximately 99,056 acres, or approximately 25.5% of the entire County land area. There are 45 recorded archaeological sites in San Lorenzo Valley, where the Town of Felton is located.²⁴

The San Lorenzo River is located approximately 435 feet east of the project site. Land adjacent to waterways tends to have a higher sensitivity to archaeological resources.

²⁴ County of Santa Cruz. *Draft Environmental Impact Report Sustainability Policy and Regulatory Update (SCH No. 2020079005)*. April 2022. Page 4.5-7.

Historic Resources

The Town of Felton has two historic places listed on the NRHP and CRHR.²⁵ The resources are the Felton Covered Bridge and the Felton Presbyterian Church, both of which are located approximately 0.8 miles south of the project site.^{26,27} The NRHP, CRHR, and Santa Cruz County General Plan/LCP EIR do not note any historic resources on the project site. The SLV campus is not a designated historic resource, i.e. it is not listed on the NRHP, CRHR, or any local register (e.g. the County).

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐
a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?				

As discussed in Section 4.5.1.2 Existing Conditions above, the project site does not contain any historic resources, and the nearest historic resources are 0.8 miles away. Moreover, the project would involve minimal demolition of structures (the existing bleachers, a snack shack, and a restroom would be demolished). There are no historic resources in the project vicinity whose integrity could be impacted as a result of the proposed project. Therefore, the project would have no impact on historical resources. **(No Impact)**

²⁵ County of Santa Cruz. *Draft Environmental Impact Report Sustainability Policy and Regulatory Update (SCH No. 2020079005)*. April 2022. Page 4.5-8.

²⁶ California Office of Historic Preservation. "California Historical Resources." Accessed February 6, 2025. <https://ohp.parks.ca.gov/ListedResources/>.

²⁷ California Office of Historic Preservation. "National Register Database and Research." Accessed February 6, 2025. <https://ohp.parks.ca.gov/ListedResources/>.

-
- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
-

As discussed in Section 4.5.1.2 Existing Conditions, the project site does not contain any recognized prehistoric or historic archaeological resources. The possibility of encountering as-yet undiscovered archaeological resources is unlikely due to the developed state of the project site. While the project is in close proximity to the San Lorenzo Valley River, the project would not require substantial excavation or grading. Additionally, the surface area of ground disturbance would be minimal.

While disturbance of archaeological resources due to project implementation is unlikely, the possibility still remains that uncovered archaeological deposits could be disturbed. In the event that historic or prehistoric archaeological resources are encountered during project implementation, impacts to these resources would be considered significant. Therefore, the project would include the following standard measures in order to comply with General Plan policy (ARC-8.1.5), Chapter 16.40.040 of the SCCC, and California codes.

Standard Measures:

Presence of Artifacts and/or Human Remains. Any property owner who, at any time in the preparation for or process of excavating or otherwise disturbing the ground, discovers any human remains of any age, or any artifact or other evidence of a Native American cultural site which reasonably appears to exceed 100 years of age, shall:

- Cease and desist from all further excavations and disturbances within 200 feet of the discovery.
- Arrange for staking completely around the area of discovery by visible stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery; provided, however, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking.
- Notify the proper authority in accordance with the Native American Cultural Sites ordinance. Notify the Sheriff-Coroner of the discovery if human remains have been discovered.
- Grant all duly authorized representatives of the Coroner permission to enter onto the property and to take all actions consistent with this chapter.
- All provisions of California Health and Safety Code Sections 7054 and 7050.5 and Public Resources Code Sections 5097.9 through 5097.99, as amended per Assembly Bill 2641, shall be followed in the event that human remains are discovered.

Recent Human Remains. If the Coroner determines that the remains are of recent origin, and that they are not a part of a site, then the provisions of this chapter shall no longer apply, and the Coroner shall notify the property owner when excavation or development may proceed. If the Coroner determines that the remains are not obviously of recent origin, the Coroner shall forthwith notify the Superintendent of the discovery of said remains.

Property Inspection. Upon notification of the discovery, the Superintendent shall arrange for an inspection of the property. Said inspection shall take place within 72 hours of notice to the Superintendent of the discovery. A representative of local Native California Indian groups, such as N.I.C.P.A., shall be notified of the time of the inspection, and both may accompany the Superintendent and their representative at all times on the property. The purpose of the inspection shall be to determine whether the discovery is a site of cultural significance.

Resumption of the Development

- If the aforementioned inspection has not taken place within 72 hours of notice of discovery to the Superintendent, ground disturbance of the property may proceed; except, however, that if human remains have been discovered, no excavation or development may take place until specifically authorized by the Coroner.
- If the Superintendent determines that the discovery is not a site of cultural significance, excavation or the development may be resumed.

Culturally Significant Sites. If the Superintendent determines that the discovery is a site of cultural significance, an archaeological report must be prepared and no further excavation or development may take place except as authorized by an archaeological site development approval. [Ord. 3444 § 1, 1983; Ord. 3334 § 1, 1982; Ord. 2800, 1979; Ord. 2506, 1977; Ord. 2385, 1977].

With implementation of the above standard measures, the project would not result in a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

-
- c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?
-

The project site is currently developed. The proposed campus improvements would require minimal excavation and grading as discussed in Section 3.1 Project Description. Therefore, there is the possibility for excavation to uncover as yet unrecorded burials. Should human remains be discovered as a result of the project, the standard measures described under Checklist Question b) would be implemented. With implementation of the standard condition, the project would not result in a significant impact to human remains. **(Less than Significant Impact)**

4.6 Energy

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan, identify and recommend measures to achieve these policy goals, and implement strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a

legislative mandate to reduce California’s energy consumption. Title 24 is updated approximately every three years.²⁸ Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.²⁹

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars II program in 2022 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2026 through 2035. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.³⁰

Local

County of Santa Cruz Climate Action Strategy

The County Board of Supervisors approved the County’s Climate Action Strategy (CAS) on February 26, 2013. The CAS outlines 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 CAS identifies the following eight strategies for the reduction of GHGs from energy use, as well as several related actions for achieving the strategies:

- Develop a Community Choice Aggregation Program, if feasible
- Increase energy efficiency in new and existing buildings and facilities
- Enhance and expand the Green Business Program
- Increase local renewable energy generation
- Public education about climate change and the impacts of individual actions

²⁸ California Building Standards Commission. “California Building Standards Code.” Accessed January 9, 2025. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

²⁹ California Energy Commission (CEC). “2022 Building Energy Efficiency Standards.” Accessed January 9, 2025. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>.

³⁰ California Air Resources Board. “Advanced Clean Cars II.” Accessed January 9, 2025. <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii>.

- Continue to improve the Green Building Program by exceeding the minimum standards of the state green building code (CALGreen)
- Form partnerships and cooperative agreements among local governments, educational institutions, non-governmental organizations, and private businesses as a cost-effective way to facilitate mitigation and adaption
- Reduce energy use for water supply through water conservation strategies

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,882 trillion British thermal units (Btu) in the year 2022, the most recent year for which this data was available.³¹ Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,204 trillion Btu) for residential uses, 17 percent (1,193 trillion Btu) for commercial uses, 22 percent (1,539 trillion Btu) for industrial uses, and 43 percent (2,916 trillion Btu) for transportation.³² This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Central Coast Community Energy (3CE), formerly Monterey Bay Community Power, was formed in March 2017 as a joint powers authority to provide locally controlled, clean, and renewable electricity to residents and businesses in Monterey, San Benito, and Santa Cruz Counties, as well as parts of Santa Barbara and San Luis Obispo Counties, through the Community Choice Energy (CCE) model established by the State of California. The CCE model enables communities to choose clean-source power at a cost equivalent to PG&E while retaining PG&E's role in maintaining power lines and providing customer service. PG&E delivers power and maintains electric infrastructure, while 3CE manages where (local vs. California vs. out-of-state) and how (solar, wind, geothermal, etc.) electricity is generated. The CCE model helps support local economic vitality because surplus revenues that would normally flow to PG&E will stay in the community. 3CE started serving electricity to customers in Santa Cruz County beginning in Spring 2018, with current PG&E customers automatically switched over.³³

Electricity in Santa Cruz County in 2022 was consumed primarily by the non-residential sector (53 percent), followed by the residential sector consuming 47 percent. In 2022, a total of approximately 1,177 gigawatt hours (GWh) of electricity was consumed in Santa Cruz County.³⁴

³¹ United States Energy Information Administration. "California State Energy Profile." Accessed March 16, 2025. <https://www.eia.gov/state/print.php?sid=CA>.

³² Ibid.

³³ County of Santa Cruz. Sustainability Policy and Regulatory Update. Draft Environmental Impact Report. Section 4.6-1. April 2022.

³⁴ California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed March 16, 2025. <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

Natural Gas

In 2024, California's natural gas supply came from a combination of in-state production and imported supplies from other western states and Canada.³⁵ In 2022, Santa Cruz County used 52 million therms, which was less than one percent of the state's total consumption of natural gas.³⁶

In 2021, PG&E delivered approximately 53 million therms to Santa Cruz County, with 33 million therms for non-residential use and 20 million therms for residential use

Fuel for Motor Vehicles

In 2024, California produced 105 million barrels of crude oil and in 2019, 15.4 billion gallons of gasoline were sold in California.^{37, 38} The average fuel economy for new light-duty vehicles (motorcycles, cars, and light trucks/vans) in the United States has steadily increased from about 13 miles per gallon (mpg) in the mid-1970s to 27.1 mpg in 2023.³⁹ Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.^{40,41}

³⁵ California Gas and Electric Utilities. 2024 *California Gas Report*. Accessed March 16, 2025. <https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf>

³⁶ According to the California Energy Commission, the State of California consumed 11,710.64 million therms of natural gas in 2022. California Energy Commission. "Natural Gas Consumption by County." Accessed March 16, 2025. <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

³⁷ U.S. Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." Accessed March 21, 2025. <https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a>

³⁸ California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed March 21, 2025. <https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist>.

³⁹ United States Environmental Protection Agency. "The 2024 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2024. Accessed March 21, 2025. <https://www.epa.gov/automotive-trends>.

⁴⁰ United States Department of Energy. *Energy Independence & Security Act of 2007*. Accessed March 24, 2024. <http://www.afdc.energy.gov/laws/eisa>.

⁴¹ United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed March 24, 2024. <https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026>.

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐
a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				

Construction

Construction of the project would require energy for the manufacture and transportation of the lights, bleachers, and building materials, preparation of the project site, foundation and utility work, installation of the lights and bleachers, and construction of the restroom, snack shack, and press boxes. Construction processes are generally designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, as well as maintenance and fuel. The proposed project would implement several measures that would improve the efficiency of the construction process, such as restricting equipment idle times to five minutes or less and posting signs on-site reminding workers to shut off idle equipment. For these reasons, the construction process is already efficient and opportunities for increasing energy efficiency during construction are limited.

Operation

The proposed lights are designed to be energy efficient and to emit no more light than is necessary to illuminate the playing field. Operation of the lights would be restricted to scheduled sporting and marching band activities, including practices and games, and evening special events, such as commencement exercises. The remainder of the year the lights would be shut off to conserve energy. Furthermore, the lights would utilize LED lights, which are more efficient than standard incandescent light bulbs. The electrical demand of the proposed lights is summarized in Table 4.6-1 below.

Table 4.6-1: Maximum Load of Proposed Lights

Light Location	Maximum Load (kW)
Football Field	55.36
Baseball Field	42.04
Softball Fields	45.27

For context, the average US household consumes 875 kWh per month.⁴² Minimal electricity would be utilized by the proposed restroom and snack shack, for functions such as lighting and heating of food. The project would be required to comply with Title 24 requirements for energy efficiency. Therefore, although the proposed project would increase energy use, this increase would not be considered wasteful or inefficient given the required compliance with energy and lighting efficiency standards in Title 24. As discussed in Section 4.3 Air Quality, the project would not result in substantial new trips, rather existing trips to other stadiums for night games would be redirected to the SLV campus, and existing trips to the SLV campus now occurring during daylight hours would be made in the evening; therefore, the project would not cause a substantial increase in the consumption of gasoline. The project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during construction and operation of the project. **(Less than Significant Impact)**

-
- b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
-

The proposed lights would be designed for energy efficiency. Operation of the lights would be restricted to scheduled sporting and marching band activities, including practices and games, and evening special events, such as commencement exercises. The remainder of the year the lights would be shut off to conserve energy. The project would be subject to Title 24 and CalGreen and would be reviewed for consistency with Title 24 and CalGreen building codes during the permit process.

As described in Section 4.6.1.1., 3CE started providing clean energy to the County as of 2018. 3CE is on a pathway to 60 percent clean and renewable energy by 2025 and 100 percent clean and renewable energy by 2030. The County's procurement of energy through 3CE and the projected 100 percent clean and renewable energy sourcing by 2030 will give customers the option of purchasing this clean energy 15 years ahead of California's SB 100 requirement of zero carbon energy by 2045. SLV's use of electricity procured by 3CE ensures that the project would utilize clean energy.

The project would not conflict with the County's ability to implement the strategies within the CAS. For these reasons, the project would not obstruct any plans for renewable energy or efficiency. **(Less than Significant Impact)**

⁴² EIA. Use of Energy Explained. Accessed March 26, 2025. <https://www.eia.gov/energyexplained/use-of-energy/electricity-use-in-homes.php>

4.7 Geology and Soils

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The CBC prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to geology and soils and are applicable to the proposed project:

Policy	Description
ARC-6.1.1 (LCP)	Protection and Designation of Significant Resources. Protect significant geological features such as caves, large rock outcrops, inland cliffs and special formations of scenic or scientific value, hydrological features such as karst topography, major waterfalls or springs, and paleontological features, through the environmental review process. Designate such sites on the General Plan/LCP Resources and Constraints Maps where identified. Currently identified sites of Significant Hydrological, Geological, and Paleontological Features are as follows: Bonny Doon Planning Area: 1. Majors Creek Canyon: The cliffs and exposed rocks of this canyon to the east of Highway 1 are outstanding geologic and scenic features. 2. Martin Road: East and west of Martin Road, encompassed in the botanical sites, are unusual sandhill outcroppings. 3. Wilder Creek: This area contains a concentration of limestone caves worth protecting. 4. Table Rock: Highly scenic coastal rock formations (sedimentary intrusive bodies) can be found in the vicinity of Table Rock and Yellow Bank Creek.
ARC-6.1.2 (LCP)	Protecting Significant Resources Through Easements and Land Dedications. Encourage and obtain where possible Open Space Easements or other forms of land dedication to conserve as open space those areas containing hydrological, geological, or paleontological features of significant scenic or scientific value.
Public Safety Element 6.1.8 (LCP)	Design Standards for new Public Facilities. Require all new public facilities and critical structures to be designed to withstand the expected ground shaking during the design earthquake on the San Andreas Fault.
Public Safety Element 6.3.4 (LCP)	Erosion Control Plan Approval Required for Development. Require approval of an erosion control plan for all development, as specified in the Erosion Control ordinance. Vegetation removal shall be minimized and limited to that amount indicated on the approved development plans, but shall be consistent with fire safety requirements.

Public Safety Element 6.3.5	Installation of Erosion Control Measures. Require the installation of erosion control measures consistent with the Erosion Control ordinance, by October 15, or the advent of significant rain, or project completion, whichever occurs first. Prior to October 15, require adequate erosion control to be provided to prevent erosion from early storms. For development activities, require protection of exposed soil from erosion between October 15 and April 15 and require vegetation and stabilization of disturbed areas prior to completion of the project. For agricultural activities, require that adequate measures are taken to prevent excessive sediment from leaving the property.
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4.7.1.2 *Existing Conditions*

Geology and Soils

Santa Cruz County is located along the southwestern side of the Santa Cruz Mountains. These mountains are in the central portion of the Coast Ranges Physiographic Province of California and are underlain by granitic and metamorphic rocks. The core of the mountain range is dominated by gneiss, schist, limestone, quartzite, and granite. This suite of basement rocks is separated from contrasting basement rock of the Franciscan Formation to the northeast by the San Andreas Fault System. The County is not in an area of regional ground subsidence per USGS. Additionally, the project area is not in an area with expansive soils.⁴³

Groundwater

The project site is located within the San Lorenzo watershed. The watershed encompasses the Town of Felton.⁴⁴

Seismic Hazards

Santa Cruz County is located in a seismically active region of California. The County is located between the San Andreas Fault, located along the northeast County boundary, and the San Gregorio Fault, located along the northwest County coast. Ground surface rupture due to faulting within the County is possible along the San Andreas, San Gregorio, Lomita, Butano, and Zayante-Vergeles faults. The closest fault zone to the project is the Butano Fault Zone, which is approximately 7.5 miles northeast of the project site.

Landslides and Liquefaction

The southern region of the County is underlain by alluvium and is considered at very high, high, or moderate risk for liquefaction potential. Coastal areas of the County also have a high to very high liquefaction potential. As a consequence of the 1906 San Francisco and the 1989 Loma Prieta earthquakes, liquefaction and landslides within the County occurred. The CGS has created maps

⁴³ County of Santa Cruz. *Draft Environmental Impact Report Sustainability Policy and Regulatory Update (SCH No. 2020079005)*. April 2022. Figure 4.7-2.

⁴⁴ Santa Cruz County Environmental County Environmental Health. "Santa Cruz County Watersheds." Accessed February 7, 2025.
<https://scceh.com/NewHome/Programs/WaterResources/FisheriesWatershedManagement/SantaCruzCountyWatersheds.aspx>.

delineating areas of seismically induced landslide hazards for portions of the state, but to date, the CGS has not created seismically induced landslide hazard maps for Santa Cruz County. Landsliding occurs throughout Santa Cruz County but is centered primarily along the steeper slopes in the hills and mountains, along stream corridors, and along coastal bluffs and inlets. Isolated landslides occur throughout the County. The site is in an area that has moderate liquefaction potential.⁴⁵ The project site is not located within a landslide hazard area.⁴⁶

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open or “free” face such as an open body of water, channel, or excavation. The closest waterway to the project is the San Lorenzo River, which is approximately 435 feet east of the project site. However, the project site is not directly adjacent to the river, as Highway 9 and various structures separate the site from the river.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments from in geologic strata. The total area of mapped geologic paleontological resource areas in the County is approximately 6,161 acres. Seven areas within the County are likely to have rare or unique geological and paleontological resources. The largest of these areas is located between the Lompico and Glenwood areas in the Santa Cruz Mountains and Scotts Valley. Another area is located within the north coast and urban areas on the northwestern edge of the City of Santa Cruz. The remaining five areas are all located within the north coast area. Per the Santa Cruz County General Plan/LCP EIR, as well as the County’s GIS mapping tool,⁴⁷ the SLV campus is not located within an area mapped as likely to have rare or unique geological and paleontological resources.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

⁴⁵ County of Santa Cruz. *Draft Environmental Impact Report Sustainability Policy and Regulatory Update (SCH No. 2020079005)*. April 2022. Figure 4.7-1.

⁴⁶ County of Santa Cruz. *Landslide Hazard Zones*. Map. January 2021.

⁴⁷ Santa Cruz County. GIS Web. Accessed April 9, 2025. <https://sccgis.santacruzcountyca.gov/gisweb/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
- 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)?	☐	☐	☒	☐
- Strong seismic ground shaking?	☐	☐	☒	☐
- Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
- Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☐	☒	☐

-
- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?
-

The project site is not located on a known active fault or located in an Alquist-Priolo Earthquake Fault Zone, liquefaction zone, or other fault hazard zone.⁴⁸ Yet, the project site is located in a seismically active region. The project site would be subject to strong seismic ground shaking and seismic-related ground failure, including liquefaction, in the event of a large earthquake. To avoid and/or minimize potential damage from seismic shaking, the proposed project would be built using standard engineering and seismic safety design techniques. Adhering to the California Building Code, County Building Code, and various policies and actions established in the proposed Sustainability Update would minimize seismic related impacts. **(Less than Significant Impact)**

- b) Would the project result in substantial soil erosion or the loss of topsoil?
-

The proposed project would require minimal ground disturbing activities including; excavation for pole foundation installation and bleacher support piers, and trenching and boring for utility installation.

Small portions of the project site would be exposed during this time. By implementing standard grading and best management practices, adhering to the Santa Cruz County General Plan/LCP policies set forth in Chapter 9: Public Safety, and the management of surface runoff and construction-related erosion, as further discussed in Section 4.10 Hydrology and Water Quality, the proposed project would have a less than significant impact on soil erosion at the site. **(Less than Significant Impact)**

- c) Would the project 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?
-

The proposed project is not located in a zone with high or very high liquefaction potential, or within a landslide hazard area as discussed in Section 4.7.1.2 Existing Conditions. As discussed under Checklist Question c), the proposed project would adhere to Santa Cruz County General Plan/LCP policies set forth in Chapter 9: Public Safety, and would manage surface runoff and construction-related erosion. Therefore, the project would not 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

⁴⁸ California Geological Survey. "Earthquake Zones of Required Investigation." Accessed February 6, 2025. <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>.

off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

- d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
-

As discussed in Section 4.7.1.2 Existing Conditions, the soils underlying the project site are not within an area mapped to have expansive soils. The project would be designed in accordance with the 2022 California Building Standards Code. For these reasons, the project would not create substantial direct or indirect risks to life or property as a result of being located on expansive soils. **(No Impact)**

- e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
-

The project site would continue to be served by an existing septic system, which is adequately supported by the soil onsite. The project would not connect to existing sewer lines. Therefore, the project has soils that can adequately support the use of septic tanks. **(No Impact)**

- f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?
-

Chapter 16.44 of the SCCC provides methods and regulations for the identification and treatment of paleontological resources within the County. As the site is not known to contain paleontological resources, a paleontological survey is not required. Although not anticipated, construction activities could disturb paleontological resources, if present.

Regardless, the project would implement the following standard measure should paleontological resources be discovered during project construction.

Standard Measure:

If vertebrate fossils are discovered during construction, all work on the site will stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The District will be responsible for implementing the recommendations of the paleontological monitor, and a final report documenting the implementation of the treatment program shall be prepared.

With implementation of the standard measure described above, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact)**

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

Greenhouse gases (GHG) are gases that trap heat in the atmosphere and regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO₂ equivalents (CO₂e). The most common GHGs are carbon dioxide (CO₂) and water vapor but there are also several others, most importantly methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These are released into the earth's atmosphere through a variety of natural processes and human activities (anthropogenic). Natural and anthropogenic sources of GHGs are generally as follows:

- CO₂ exchange between the atmosphere, ocean, and land surface
- CO₂, CH₄, and N₂O are emitted from wildfires and volcanic eruptions
- CO₂ and N₂O are byproducts of fossil fuel combustion
- N₂O is associated with agricultural operations such as fertilization of crops
- CH₄ is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty
- HFCs are now used as a substitute for CFCs in refrigeration and cooling
- PFCs and SF₆ emissions are commonly created by industries such as aluminum production and semiconductor manufacturing

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. Per the 2022 Scoping Plan from CARB, atmospheric concentrations of CO₂ have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year, which will result in increased global temperatures.⁴⁹ The climate within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

⁴⁹ CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 3.

4.8.1.1 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to accelerate 2030 statewide target in terms of million metric tons of CO₂e (MMTCO₂e). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO₂e.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.⁵⁰ The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035.

⁵⁰ CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 5.

SB 100

SB 100, known as The 100 Percent Clean Energy Act of 2018, was adopted on September 10, 2018. The overall goal is to have all retail electricity sold in California be procured from 100 percent renewable and zero-carbon resources by the year 2045. SB 100 also modified the renewables portfolio standard to 50 percent by 2025 and 60 percent by 2030.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and implement strategies that enable CO₂ removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

Advanced Clean Cars II Regulation

To continue reducing air pollutants and GHG emissions in the transportation sector, CARB adopted the Advanced Clean Cars II Regulations (Resolution 22-12) on August 25, 2022. The new regulation requires that by 2035 all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles. This regulation bans the sale of new gasoline or diesel passenger cars, trucks, and SUVs in California from automakers. Beginning in 2026, 35 percent of new vehicle sales must be zero-emission vehicles and plug-in hybrid electric vehicles (EV) and that percentage will increase per year. By 2030, 70 percent of new vehicle sales will be zero-emissions vehicles and by the 2035 model year 100 percent of new vehicle sales will be zero-emissions. CARB will limit the use of plug-in hybrid EVs in the percentage requirements to keep the manufacturing of zero-emissions as the primary goal. Existing gasoline cars can continue to be driven and sold as used cars beyond 2035. CARB is required to track and report on the zero-emissions vehicle market development annually.

California Building Standards Code – Title 24 Part 11 and Part 6

The CALGreen Code is part of the California Building Standards Code under Title 24, Part 11.⁵¹ The CALGreen Code encourages sustainable construction standards that incorporate planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2022 CALGreen Code) was effective as of January 1, 2023.

⁵¹ California Government. CALgreen. Accessed March 30, 2025. <https://www.dgs.ca.gov/BSC/CALGreen>.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by cities during the planning and building permit process. The 2022 Energy Code replaced the 2019 Energy Code as of January 1, 2023. There are new 2022 standards for single-family residences, multi-family residences, and non-residential uses.^{52,53,54} Major changes include electric-ready single-family and multi-family residence and solar photovoltaic systems and energy storage systems for residential and commercial developments.

Requirements for EV charging infrastructure are set forth in Title 24 of the California Code of Regulations and are regularly updated on a three-year cycle. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The 2022 CALGreen standards require deployment of additional EV chargers in various building types, including multi-family residential, hotel, and non-residential land uses. They include requirements for both EV capable parking spaces and the installation of EV supply equipment for multi-family residential and nonresidential buildings. The 2022 CALGreen standards also include requirements for both EV readiness and the actual installation of EV chargers.

CALGreen also requires new construction and demolition projects to have a diversion of at least 65 percent of the construction waste generated.

Regional and Local

Association of Monterey Bay Area Governments

The Association of Monterey Bay Area Governments (AMBAG) is the designated MPO for the Monterey Bay region. The AMBAG region includes Monterey, San Benito, and Santa Cruz counties. As of 2009, many of the cities and counties in the AMBAG jurisdiction had not quantified their baseline GHG inventories, due to lack of staff and funding. The AMBAG Energy Watch designed a program to assist member jurisdictions in a variety of climate action planning support services. Additionally, in 2008, AMBAG adopted the Monterey Bay Regional Energy Plan (Regional Energy Plan). The Regional Energy Plan provides a framework that local cities and counties can adopt or use as guidelines to reduce energy use.

⁵² California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Single-Family Residential." Revised July 15, 2022. Accessed January 9, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Single-family_Whats_New_Summary_ADA.pdf.

⁵³ California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Multifamily." Revised August 4, 2022. Accessed January 9, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Multifamily_Whats_new_Summary_ADA.pdf.

⁵⁴ California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Nonresidential." Revised August 4, 2022. Accessed January 9, 2025. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Nonresidential_Whats_New_Summary_ADA.pdf.

Additionally, CARB set SB 375 GHG-reduction targets for the Monterey Bay Area at zero percent increase from 2005 per capita emissions by 2020, and five percent below 2005 per capita emissions by 2035. In June 2014, AMBAG adopted the Moving Forward 2035 Monterey Bay – Metropolitan Transportation Plan/Sustainable Communities Strategy (2035 MTP/SCS). The 2035 MTP/SCS demonstrated that, if implemented, the region would achieve over a three percent per capita GHG reduction in passenger vehicle emissions by 2020, and an approximately six percent reduction in 2035. These reductions meet the GHG targets for AMBAG, as discussed above.

In June 2018, AMBAG adopted an update to the 2035 MTP/SCS, Moving Forward Monterey Bay 2040 (2040 MTP/SCS), the implementation of which was anticipated to achieve a four percent capita reduction in GHG emissions from passenger vehicles by 2020, as well as a projected reduction in GHG emissions of nearly seven percent per capita from passenger vehicles by 2035. The 2040 MTP/SCS outlines the region’s proposed transportation network, emphasizing multimodal system enhancements, system preservation, and improved access to high quality transit, as well as land use development that complements this transportation network.

Monterey Bay Air Resources District

California has 35 Air Pollution Control Districts and Air Quality Management Districts, many of which are currently addressing climate change issues by developing significance thresholds, performance standards, and mitigation measures. The Monterey Bay Air Resources District (MBARD) is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the North Central Coast Air Basin (Air Basin). MBARD’s Air Quality Management Plans (AQMPs) include control measures and strategies implemented to attain California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) in the Air Basin.

County of Santa Cruz Climate Action Strategy

The County Board of Supervisors approved the County’s Climate Action Strategy (CAS) on February 26, 2013. The first portion of the CAS reports the results of the GHG emissions inventory for Santa Cruz County, proposes targets for the GHG reduction, and outlines strategies and implementing actions to achieve the targets. GHG reduction strategies are proposed for the three sectors with the highest emissions: transportation, energy, and solid waste. A plan for monitoring the implementation of emissions reduction is introduced, which includes identifying the group with responsibility for implementation, periodic reporting, and a recommendation for updating the GHG emissions inventories every five years. The second portion focuses on a vulnerability assessment and strategies for adapting to the types of impacts that are likely to occur in Santa Cruz County. The vulnerability assessment was prepared to identify the conditions that may occur in Santa Cruz County as a result of the various components of climate change (increasing temperature, rising sea level, and shifts in the precipitation regime) and the locations, infrastructure, and economic sectors that are particularly vulnerable to negative impacts. The assessment identifies the coastal areas that are most susceptible to increased flooding, storm surge, and beach and coastal bluff erosion

from winter storms. Eight climate adaptation goals were articulated as a guide for the development of more specific adaptation strategies that would further reduce vulnerability to climate change.

- Protect the unique character, scenic beauty, and culture in the natural and built environment from being compromised by climate change impacts.
- Support initiatives, legislation, and actions to respond to climate change.
- Encourage and support actions that reduce risks and vulnerabilities now, while recognizing the importance of identifying, making decisions about, and preparing for impacts and risks that may develop in the future.
- Support the reduction of risks from other environmental hazards, noting the strong interrelationships and benefits between reducing risk from climate change, non-climate change related disasters, and most other environmental hazards.
- Build resilience into all programs, policies, and infrastructure.
- Encourage climate change resilience planning and actions in private companies, institutions, and systems essential to a functioning County of Santa Cruz.
- Encourage community involvement and public-private partnerships to respond to potential climate impacts, particularly for those most vulnerable.
- Ensure that the County of Santa Cruz remains a safe, healthy, and attractive place with a high quality of life for its residents, businesses, and visitors.

4.8.1.2 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns.

Most of the GHG emissions associated with the existing uses on campus result from the emissions from vehicles traveling to and from the campus.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☐	☒	☐

The State CEQA Guidelines do not prescribe specific methodologies for performing a GHG emissions assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA. Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs.

To date, MBARD has not adopted significance criteria or thresholds for land use projects. The MBARD-adopted significance threshold of 10,000 MT of CO₂e for stationary source projects does not directly apply to the project, as the majority of emissions are generated by non-stationary sources of GHG (such as on-road vehicles).

-
- a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
-

Construction

GHG emissions would be generated during construction of the proposed project, primarily from the operation of heavy equipment and the transport of materials to and from the site. Construction-related GHG emissions vary depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel. Neither the District, MBARD, nor the County have an adopted threshold of significance for construction-related GHG emissions.

Best management practices can help reduce GHG emissions during construction where feasible and applicable. Best management practices incorporated into construction of the project include but are not limited to using at least 10 percent local building materials and recycling or reusing at least 50 percent of construction waste or demolition materials. Construction of the lights and PA system is estimated to last six months, and construction of the remainder of the project is estimated to last three to six months. Because construction would be temporary and would not result in a permanent increase in emissions, the project would not result in a significant GHG impact due to construction emissions.

Operation

Once operational, the proposed stadium lights and PA system would indirectly generate GHG emissions due to the energy required to power them. The restroom and snack shack would require minimal energy for lighting. As discussed in Section 4.6 Energy, the proposed lights would not result in wasteful or unnecessary consumption of energy, as the increase in energy expenditures would be marginal. Additionally, the project would use 3CE energy, which provides 60 percent clean and renewable energy and will provide 100 percent clean and renewable energy by 2030.

With completion of the project, the existing night varsity football games currently held at an offsite location would be played on-campus, which would increase the number of sporting events hosted on campus by one to two games. While the increase in events on campus would correspond to an increase in vehicle trips to and from the site, the total vehicle miles traveled (VMT) would theoretically decrease, as the project is locally serving and would reduce the number of sporting events held at other stadiums that attendees, predominantly students and parents from within the District boundaries, currently travel to. Therefore, implementation of the project would reduce the need for spectators to travel to the offsite location to attend games; thereby reducing the VMT (and associated GHG emissions) compared to existing conditions. The proposed project would not increase enrollment capacity at SLV. Therefore, the proposed project would not result in a significant GHG emissions impact. **(Less than Significant Impact)**

-
- b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?
-

AMBAGs Metropolitan Transportation Plan/ Sustainable Communities Strategy

AMBAG's 2045 MTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks within the Monterey Bay Area. The 2045 MTP/SCS incorporates local land use projections and circulation networks from city and county general plans. Typically, a project would be consistent with the MTP/SCS if the project does not exceed the underlying growth parameters within the MTP/SCS. Since the project would not result in increased long-term employment, school enrollment, or population growth, the project would not contribute to an exceedance of AMBAG growth projections nor would it conflict with the 2045 MTP/SCS.

County of Santa Cruz Climate Action Strategy

The CAS outlines strategies and implements actions to achieve GHG reduction targets. GHG reduction strategies are proposed for the three sectors with the highest emissions: transportation, energy, and solid waste. None of the reduction measures are directly applicable to the project, including the proposed lighting. Additionally, the proposed project would install LED lighting fixtures which are designed for energy efficiency. As described under Checklist Question a), the proposed project would not result in significant GHG emissions. For these reasons, the proposed project would not conflict with the CAS. **(Less than Significant Impact)**

4.9 Hazards and Hazardous Materials

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, \$1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.⁵⁵

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.⁵⁶

⁵⁵ United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed January 10, 2025. <https://www.epa.gov/superfund/superfund-cercla-overview>.

⁵⁶ United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed January 10, 2025. <https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act>.

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).⁵⁷

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The Santa Cruz County Department of Environmental Health reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.⁵⁸ The EPA is currently considering a proposed ban on on-going use of asbestos.⁵⁹ National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

⁵⁷ California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. <https://calepa.ca.gov/sitecleanup/corteselist/>.

⁵⁸ United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed April 19, 2022. <https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos>.

⁵⁹Ibid.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistering, it is required to be removed prior to demolition.

Local

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to hazards and hazardous materials and are applicable to the proposed project:

Policy	Description
Public Safety Element 6.6.1	Hazardous Materials Ordinance. Maintain the County's Hazardous Materials ordinance, placing on users of hazardous and toxic materials the obligation to eliminate or minimize the use of such materials wherever possible, and in all cases to minimize the release, emission, or discharge of hazardous materials to the environment, and properly to handle all hazardous materials and to disclose their whereabouts. Further, maintain the County's ordinance relating to ozone-depleting compounds. Ensure that any amendment of existing ordinance provisions is based on a finding that the amendments will provide protection to the environment and the community against toxic hazards that is equal to or stronger than the existing provisions.
Public Safety Element 6.6.2	County Use of Toxic/Hazardous Materials. Eliminate wherever possible, and minimize where elimination is not feasible, the use of hazardous and toxic materials in the operations and programs of County government.
Public Safety Element 6.7.2	Sizing Facilities. Facilities shall be designed and sized primarily to meet the hazardous waste management needs of this County, or to meet any broader future commitments made as part of an inter-jurisdictional agreement, or upon a determination of the local body that the project meets local planning criteria and serves public needs.
Public Safety Element 6.7.3	Location of Facilities. Require any proposed hazardous waste management facility to be located only in those general areas identified in the Hazardous Waste Management Plan.
BE-5.4.1 (LCP)	Airport Influence Area. The Airport Influence Area (AIA) is defined as the area within two miles of the boundary of the Watsonville Municipal Airport.

County of Santa Cruz Local Hazard Mitigation Plan

The County Local Hazard Mitigation Plan (LHMP) 2021-2026 was prepared in accordance with requirements of FEMA. FEMA reviews and approves LHMPs and requires an update on a five-year cycle. The County LHMP identifies potential hazards in the County, including wildfire hazards. The plan provides hazard mitigation to implement actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Mitigation actions include both short-term and long-term activities that reduce the impacts of hazards, reduce exposure to hazards, or reduce effects of hazards through various means, including preparedness,

response and recovery measures. Effective mitigation actions also reduce the adverse impacts and cost of future disasters.

Operational Area Emergency Management Plan

The County Office of Emergency Services developed the Operational Area Emergency Management Plan (EMP) in October 2015. The EMP addresses the planned response to emergencies and incidents affecting the unincorporated areas of the County. The purpose of the EMP is to establish a comprehensive approach to emergency management and provide guidance to agencies within the operational area in the protection of public health and safety and preparing for or responding to incidents.

Santa Cruz County Code

Chapter 7.100 of the SCCC regulates hazardous materials and hazardous wastes. The section indicates that Chapters 6.11 (Unified Hazardous Waste and Hazardous Materials Management Regulatory Program), 6.5 (Hazardous Waste Control), 6.7 (Underground Storage of Hazardous Substances), 6.75 (Petroleum Underground Storage Tank Cleanup), and 6.95 (Hazardous Materials Release Response Plans and Inventory) of the California Health and Safety Code are adopted and are to be used in conjunction with the provisions of this chapter of the SCCC.

4.9.1.2 *Existing Conditions*

The site is currently developed with a public high school. The project site consists of three athletic fields: the football, softball, and baseball fields. The football field consists of a rubberized track, turf athletic field, and portable storage/restroom buildings along the perimeter of the track. The varsity baseball field consists of a grass outfield, clay/gravel/grass infield, a pitchers' mound, and restrooms. The JV softball field is a grass field with a gray gravel infield and grass outfield. The varsity softball field is immediately east of the JV softball field and consists of a gray gravel infield and a grass outfield.

The site is not listed on the Cortese List.⁶⁰ The nearest site to the project that is on the Cortese list is San Lorenzo Valley Elementary School, located approximately 130 feet north of the project site. The San Lorenzo Valley Elementary School is listed on the Cortese List as a closed LUST site and is separated from the project site by multiple buildings.⁶¹

⁶⁰ CalEPA. "Cortese List Data List Resources." Accessed February 10, 2025.
<https://calepa.ca.gov/SiteCleanup/CorteseList/>.

⁶¹ CalEPA. "GeoTracker." Accessed February 10, 2025.
https://geotracker.waterboards.ca.gov/search?page=183&cmd=search&business_name=&main_street_name=&city=&zip=&county=&status=&branch=&site_type=LUFT&npl=&funding=&reporttitle=PROJECT+SEARCH+RESULTS&reportty.

Airports

Watsonville Municipal Airport is the only public airport within the County and is located approximately 17.8 miles southeast of the project site. The project is not within the Watsonville Municipal Airport's Airport Influence Area (AIA).⁶² There are three private airports within the County of Santa Cruz: the Monterey Bay Academy Airport (approximately 16.7 miles southeast of the project site), the Las Trancas Airport (approximately 10.5 miles northwest of the project site), and the Bonny Doon Village Airport (approximately 2.3 miles northwest of the project site).

Wildland Fires

The project site is located within a high FHSZ in a State Responsibility Area⁶³ and a high FHSZ in a Local Responsibility Area, as shown on Figure 4.20-1.⁶⁴

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) 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, will it create a significant hazard to the public or the environment?	☐	☐	☐	☒

⁶² County of Santa Cruz. *County of Santa Cruz General Plan / Local Coastal Program*. March 2024. Chapter 2: Built Environment Element.

⁶³ Cal Fire. Fire Hazard Severity Zones Maps. Accessed March 11, 2025. <https://www.fire.ca.gov/osfm/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022>

⁶⁴ Santa Cruz County Fire Department. OSFM 2025 Fire Hazard Severity Zones. Accessed March 11, 2025. <https://countyfire.santacruzcountycalifornia.gov/FireResources/OSFM2025FireHazardSeverityZones.aspx>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
e) 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, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

-
- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
-

The construction of the proposed project could involve the use of potentially hazardous materials, such as vehicle fuels, oils, and fluids. However, all hazardous materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Construction-related hazardous materials use would be temporary, and would not require routine transport, use, or disposal.

Project operation would not involve the routine transport, use, or disposal of hazardous materials. For sporting practices, games, and special events, the extent of hazardous materials used would generally be limited to those needed for cleaning and maintenance. Compliance with applicable federal, state, and local laws and regulations pertaining to the handling, storage, and disposal of hazardous materials would ensure that no significant hazards to the public or the environment result. **(Less than Significant Impact)**

-
- b) Would the project 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?
-

As discussed above in Section 4.9.1.2 Existing Conditions, the project site is not listed on the Cortese list and is not directly adjacent to any contaminated sites. Construction of the project would involve the demolition of the existing snack shack and restroom buildings, the ages of which are unknown, therefore this analysis conservatively assumes lead-based paint and asbestos-containing materials

(ACMs) could be present.. The following standard measure would be required prior to the demolition of existing buildings.

Standard Measure

- Remove all potentially friable asbestos prior to building demolition or any renovation and reuse that could disturb asbestos. Removal of such materials would occur in accordance with the National Emissions Standard for Hazardous Air Pollutants (NESHAP) guidelines.
- Prior to demolition of structures constructed prior to 1978, remove all peeling and flaking point and dispose of separately from other building debris, in accordance with current DTSC requirements. Any debris containing lead paint or coating must be disposed of at landfills that have the appropriate acceptance criteria. If such structures are to be renovated and reused, they should be repainted with non-lead paints.
- During demolition of structures constructed prior to 1978, follow the Cal/OSHA Lead Construction Standard, Title 8 California Code of Regulations (CCR) 1532.1 requirements, which include use training, air monitoring, and dust control.
- Prior to demolition of structures, remove all fluorescent light ballasts and tubes and dispose of in accordance with EPA requirements.
- Dispose of all hazardous materials on the project site in accordance with local, state, and federal hazardous materials regulations.

The operation of the project would involve sports games, practices and special events, which would not involve the release of hazardous materials. Demolition of existing buildings would comply with the Standard Measure listed above to protect against potential asbestos and lead based paint exposures. For these reasons, the project would not 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. **(Less than Significant Impact)**

-
- c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
-

The SLV campus, which the project site is a part of, includes an elementary school, middle school, and high school. As described under Checklist Question a), project construction could involve minimal use of hazardous materials, which would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Therefore, the project would ensure that school uses are not exposed to hazardous materials, substances, or waste. Operation of the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Therefore, the project would have a less than significant impact. **(Less than Significant Impact)**

-
- d) Would the project 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?
-

As described in Section 4.9.1.2 Existing Conditions, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. **(No Impact)**

- e) If 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?
-

As described in Section 4.9.1.2 Existing Conditions, the project site is not within two miles of a public airport or public use airport, or within an airport land use plan. **(No Impact)**

- f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
-

The project would not alter the existing emergency access to the project site or the existing roadway system surrounding the site. Therefore, implementation of the project would not interfere with an emergency response plan or emergency evacuation plan. **(No Impact)**

- g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
-

As described previously in Section 4.9.1.2 Existing Conditions, the project site is located within a High Fire Hazard Severity Zone. Therefore, the campus improvements and attendees of sporting events/special events on campus would have an inherent risk of exposure to wildfire. However, existing uses on campus are already exposed to this inherent risk and the project would only increase activity on campus by approximately two games per year. As discussed in Section 4.20 Wildfire, the project would not interfere with an emergency evacuation plan. The project would avoid exacerbating wildfire risks by complying with the standards set forth in the California Public Resources Code Section 4442 through 4431, which include restrictions on the type of equipment that can be used in fire prone areas to reduce the risk of causing wildfire during construction activities. Therefore, exposure of people or structures to a significant risk of loss, injury or death involving wildland fires as a result of the project would be a less than significant impact. **(Less than Significant Impact)**

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Overview

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the EPA and the SWRCB have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the Central Coast RWQCB.

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the Central Coast RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.⁶⁵

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be

⁶⁵ California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed January 10, 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

Santa Cruz County Code

Section 7.79 of the SCCC addresses runoff and pollution control to protect the health, safety, and welfare of the public by protecting the surface and groundwater quality, groundwater recharge, beneficial uses, marine habitats, watershed health, and ecosystems of the receiving waters of the County, including Monterey Bay, from discharge of pollutants and the adverse effects of hydromodification, and to comply with Federal and State laws concerning stormwater. The SCCC requires compliance with industrial and construction NPDES discharge permits, where relevant. Prior to issuing a County permit under Title 16, Environmental and Resource Protection, a stormwater pollution control plan must be prepared addressing the use of best management practices (BMPs) during construction, including appropriate BMPs from the County Construction Site Stormwater Pollution Control BMP Manual. New development and redevelopment shall also mitigate impacts due to development and implement BMPs per the County Design Criteria. These BMPs include measures to control the volume, runoff rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects; to minimize the generation, transport, and discharge of pollutants; to prevent runoff in excess of predevelopment conditions; and to maintain predevelopment groundwater recharge.

Section 16.22 of the SCCC, “Erosion Control” aims to eliminate and prevent accelerated erosion and its associated effects. Additionally, the County’s Department of Public Works has Design Criteria and standards for streets, storm, drains, sanitary sewers, and water systems, and driveways.

County of Santa Cruz Local Hazard Mitigation Plan

The County Local Hazard Mitigation Plan (LHMP) 2021-2026 was prepared in accordance with requirements of FEMA. FEMA reviews and approves LHMPs and requires an update on a five-year cycle. The County LHMP identifies potential hazards in the County, including floods and coastal storms, earthquake and liquefaction, wildfires, drought, tsunami, coastal erosion, dam failure,

landslide, expansive soils, and climate change. The plan provides hazard mitigation to implement actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Mitigation actions include both short-term and long-term activities that reduce the impacts of hazards, reduce exposure to hazards, or reduce effects of hazards through various means, including preparedness, response and recovery measures. Effective mitigation actions also reduce the adverse impacts and cost of future disasters.

4.10.1.2 *Existing Conditions*

The project site consists of the football, softball, and baseball fields on the SLV campus.

Drainage and Flooding

There are no streams or waterways present on the site. The site itself is located within a developed area of the Town of Felton. The project area is located approximately 435 feet west of the San Lorenzo River. The project site is located within the San Lorenzo River watershed. The watershed encompasses the Town of Felton.⁶⁶ The site has not been mapped by FEMA's flood map service.⁶⁷

Stormwater infrastructure onsite consists of a series of open V ditches connecting to drain inverts varying in size from eight to 12 inches. The inverts accumulate into collection vaults running easterly through campus to a 30-inch outflow pipe. Flows enter the County's storm drain system on Highway 9 and ultimately discharge to the San Lorenzo Valley River and Monterey Bay.

Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as "non-point" source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. According to the Central Coast RWQCB, the San Lorenzo Vally River is currently listed on the 303(d) list of impaired waterways for chlordane, chloride, chlorpyrifos, enterococcus, Escherichia coli, fecal coliform, nitrate, polychlorinated biphenyls (PCBs), sedimentation/siltation, sodium, and water temperature.⁶⁸

⁶⁶ Santa Cruz County Environmental County Environmental Health. "Santa Cruz County Watersheds." Accessed February 7, 2025.

<https://sccch.com/NewHome/Programs/WaterResources/FisheriesWatershedManagement/SantaCruzCountyWatersheds.aspx>.

⁶⁷ FEMA. "FEMA Flood Map Service Center: Search by Address." Accessed March 4, 2025.

<https://msc.fema.gov/portal/search?AddressQuery=San%20Lorenzo%20Valley%20High%20School%2C%207105%20Hwy%209%2C%20Felton%2C%20CA%2095018>.

⁶⁸ Santa Cruz County. Sustainability Policy and Regulatory Update. Draft EIR. Section 4.10-14. April 2022.

Groundwater

The project site is located within the Santa Margarita Groundwater basin and is not in a groundwater recharge area.⁶⁹ The Santa Margarita groundwater basin is 34.8 square miles and half of the Basin is classified as open space.

Dam Failure

The project site is not within a dam inundation zone.⁷⁰

Seiches, Tsunamis, and Mudflows

A seiche is an oscillation of the surface of a lake or landlocked sea varying in period from a few minutes to several hours. There are no landlocked bodies of water near the project site that, in the event of a seiche, will affect the project site.

A tsunami or tidal wave is a series of water waves caused by the displacement of a large volume of a body of water, such as an ocean or a large lake. Due to the immense volumes of water and energy involved, tsunamis can devastate coastal regions. The project site is not within a Tsunami Inundation Area.⁷¹

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) 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:	☐	☐	☒	☐

⁶⁹ Santa Margarita Groundwater Agency. *Groundwater Sustainability Plan*. Figure 2-24.

⁷⁰ California Division of Dams. "California Dam Beach Inundation Maps." Accessed March 4, 2025. [Dam Breach Inundation Map Web Publisher](#)

⁷¹ County of Santa Cruz. *Draft Environmental Impact Report Sustainability Policy and Regulatory Update (SCH No. 2020079005)*. April 2022. Figure 4.10-4.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
– result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– 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	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐
a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				

Construction activities, such as excavation, may result in temporary impacts to surface water quality. When disturbance to underlying soils occurs, the surface runoff that flows across the site may contain sediments that are ultimately discharged into the storm drainage system.

The project would be considered a major development per the County of Santa Cruz Construction Site Stormwater Pollution Control BMP Manual, as the project could involve grading during the winter season (October 15th through April 15th). Therefore, the project would be required to prepare a stormwater pollution control plan (SWPPP) addressing the use of BMPs during construction, including appropriate BMPs from the County Construction Site Stormwater Pollution Control BMP Manual. The SWPPP shall include erosion control measures, sediment control measures, temporary water drainage control measures, and site housekeeping requirements for construction materials, waste management, vehicle storage and maintenance, and landscape materials.⁷²

The project would comply with Central Coast RWQCB Resolution No. R3-2013-0032, which requires development to comply with NPDES statewide Phase II Municipal General Permit, Order No. 2003-

⁷² County of Santa Cruz Planning Department. Construction Site Stormwater Pollution Control BMP Manual. October 2011.

0005-DWQ. The resolution requires all projects that create and/or replace 2,500 square feet or more of impervious surface to implement the following design strategies:

- Limit disturbance of creeks and natural drainage features
- Minimize compaction of highly permeable soils
- Limit clearing and grading of native vegetation at the site to the minimum area needed to build the project, allow access, and provide fire protection
- Minimize impervious surfaces by concentrating improvements on the least-sensitive portions of the site, while leaving the remaining land in a natural undisturbed state
- Minimize impervious surfaces by concentrating improvements on the least-sensitive portions of the site, while leaving the remaining land in a natural undisturbed state
- Minimize stormwater runoff by implementing one or more of the following site design measures:
 - Direct roof runoff into cisterns or rain barrels for reuse
 - Direct roof runoff onto vegetated areas safely away from building foundations and footings, consistent with California building code
 - Direct runoff from sidewalks, walkways, and/or patios onto vegetated areas safely away from building foundations and footings, consistent with California building code
 - Direct runoff from driveways and/or uncovered parking lots onto vegetated areas safely away from building foundations and footings, consistent with California building code
 - Construct bike lanes, driveways, uncovered parking lots, sidewalks, walkways, and patios with permeable surfaces

Per the resolution, the project would be required to treat stormwater runoff to reduce pollutant loads and concentrations using physical, biological, and chemical removal. The onsite measure listed below is the preferred method of compliance, however Section B.3.b. of the resolution lists other methods of compliance that could be implemented.

- Low Impact Development (LID) Treatment Systems – Implement harvesting and use, infiltration, and evapotranspiration Stormwater Control Measures that collectively achieve the following hydraulic sizing criteria for LID systems:
 - Hydraulic sizing criteria for LID treatment systems – LID systems shall be designed to retain stormwater runoff equal to the volume of runoff generated by the 85th percentile 24-hour storm event, based on local rainfall data.

The project would be required to implement BMPs per Chapters 16.20 and 16.22 of the SCCC to control the volume, runoff rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects to minimize the generation, transport, and discharge of pollutants and prevent runoff in excess of predevelopment conditions.

With compliance with the measures described above, the project would have a less than significant impact on water quality. **(Less than Significant Impact)**

- b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
-

As discussed previously in Section 4.10.1.2 Existing Conditions, the project site is not located within a groundwater recharge area. The project would not extract groundwater nor create a new demand for water which could impact groundwater supplies. For these reasons, the project would not decrease groundwater supplies and would not impede sustainable groundwater management of the Santa Margarita Basin. **(Less than Significant Impact)**

- c) Would the project 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 result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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 impede or redirect flood flows?
-

The proposed project would not alter the course of a stream or river. The proposed project would result in a minor increase in impervious surfaces and associated stormwater runoff. The proposed project would require concrete pole foundation installation on surfaces adjacent to the football, softball, and baseball fields that are currently permeable, slightly increasing the impervious surface onsite. Additionally, the construction of the restroom and snack shack would occur on surfaces that are currently permeable gravel. The amount of stormwater runoff generated by the proposed project would be negligible and would not result in a significant drainage impact. During construction, erosion and siltation would be managed by adherence to standard stormwater control measures, as described under Checklist Question a).

The proposed project would not increase stormwater runoff at a rate which would result in flooding on- or off-site, or exceed the capacity of the existing drainage system once operational. The project would not substantially increase polluted runoff or impede or redirect flood flows due to its small scale and the minimal impervious surfaces which would be created. For these reasons, the proposed project would not result in a significant drainage impact. **(Less than Significant Impact)**

- d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?
-

The project would not involve the routine use, storage, or disposal of hazardous materials during its operation other than limited materials for facility maintenance. As discussed under Section 4.9

Hazards and Hazardous Materials, these materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Construction of the project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and fluids. The risk of flooding on the site is not known to be significant (i.e., the site is not currently mapped within a 100-year floodplain, or subject to seiches or tsunamis), therefore, the project would result in a less than significant risk for releasing pollutants due to inundation. **(Less than Significant Impact)**

-
- e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?
-

Compliance with the regulatory measures discussed under Checklist Question a) would ensure that the project would not conflict with or obstruct implementation of a water quality control plan. As discussed above, the project is not located in a groundwater recharge area and would not require additional groundwater resources, therefore, the project would not conflict with or obstruct a sustainable groundwater management plan. **(Less than Significant Impact)**

4.11 Land Use and Planning

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to land use and planning and are applicable to the proposed project:

Policy	Description
PPF-1.1.1 (LCP)	Public Facility/Institutional Designation (P). The P designation shall characterize lands used for a variety of public and quasi-public serving uses, including schools, fire stations, government buildings, water supply and treatment facilities, as well as privately owned facilities built and maintained for public/quasi-public purposes, such as churches, hospitals, and sanitary landfills. This designation is also intended for appropriate ancillary public facility activities and secondary private uses.
PPF-1.1.8	Environmental Review of Major Public Facility/Institutional Developments. Encourage the development of master Environmental Impact Reports for major multi-phased public facility developments to guide and facilitate planning and permit processing for such projects.
PPF-3.2.2	Mitigating School Impacts from New Development. Prior to issuance of any building permit, require a written statement confirming payment in full of all applicable developer fees and other requirements lawfully imposed by each school district in which the project is located. Prior to approval of any land division or other discretionary development permit application for a project, which would authorize additional development, consider the impact of such action on each school district in which the project is located. Require feasible mitigation measures permitted by law to reduce any significant impacts on the school system or approve the project on the basis of a statement of overriding considerations. Prior to approval of any General Plan and/or LCP amendment, rezoning, or other legislative action, which would authorize additional development to occur as a matter of land use policies, consider the impact of such action on each school district within which the land is located. Either require feasible mitigation measures to reduce any significant impacts on each school district to a level of insignificance, deny the project if such mitigation measures are infeasible, or approve the project on the basis of a statement of overriding conditions. Mitigation measures may include, by way of example only, the reduction of residential densities or the controlled phasing of residential development within attendance areas of the school district having inadequate facilities or services.

4.11.1.2 *Existing Conditions*

The project site is part of the existing SLV campus located at 7105 Highway 9 in the Town of Felton. The project site consists of the existing football field, two softball fields, and one baseball field.

The site is zoned as Public and Community Facilities (PF) and has a General Plan designation of Public Facility/Institutional (P).^{73,74} According to the County's General Plan, this land use ensures that there is adequate land for both public and quasi-public facility uses within the County.

To the south of the project site is a parcel that has a General Plan designation of Mountain Residential (R-M). East of the project site, before Highway 9, are parcels with a General Plan designation of Community (C-C). Land uses to the north and east of the project site are mainly residential.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
f) Physically divide an established community?	☐	☐	☐	☒
g) 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?	☐	☐	☐	☒

f) Would the project physically divide an established community?

The proposed project would not change the existing land use on site. Project improvements would occur within the boundaries of the campus and would not divide the existing residential communities to the north and east of the project site. The proposed project would not construct features that would physically divide the surrounding community (i.e. roadway, railway, or highway). Therefore, the proposed project would not physically divide an established community.
(No Impact)

g) Would the project 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?

The District is the Lead Agency for the proposed project and the proposed project does not conflict with any District land use plan, policy, or regulation. Additionally, the proposed project does not conflict with the land use policies and regulations of Santa Cruz County. The land use (P) and zoning designation (PF) of the site are both consistent with the Santa Cruz County General Plan/LCP. Effects of the project are generally limited to impacts to aesthetics and biological resources (from the lights) and noise impacts (from the PA system). These topics are discussed within their

⁷³ Santa Cruz County. "GISWeb." Accessed February 11, 2025. <https://sccgis.santacruzcountyca.gov/gisweb/>.

⁷⁴ County of Santa Cruz. *County of Santa Cruz General Plan / Local Coastal Program*. March 2024. Figure 7-2.

respective resource sections (Sections 4.1, 4.4 and Section 4.13). Therefore, no impacts would occur due to conflict with a land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect. **(No Impact)**

4.12 Mineral Resources

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

4.12.1.2 *Existing Conditions*

There are eight quarries located in Santa Cruz County, four of which are closed.⁷⁵ The nearest active quarry to the site is the Quail Hollow Quarry, located approximately 1.10 miles northeast of the project site. The quarry mines sand from the Santa Margarita Sandstone for construction and industrial uses. The mine contains a sand processing plant and bulk sand dryer. The permitted area of the mine encompasses approximately 105 acres and mining is permitted to continue until the reserves are exhausted.

The nearest closed quarry to the site is the Olympia Quarry, located approximately 1.5 miles east of the project site. The quarry mined sand from the Santa Margarita Sandstone for construction sand. The mined area encompassed approximately 70 acres and ceased operation in 2002. All former mineral processing facilities have been removed and disturbed areas are being reclaimed to open space.

The project site is located on land with a mineral lands classification of MRZ-1. Lands classified as MRZ-1 are areas where available geologic information indicates that little likelihood exists for the presence of significant construction aggregate resources.⁷⁶

⁷⁵ Santa Cruz County. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

⁷⁶ California Department of Conservation. California Geological Survey. Mineral Resource Zone Map for Construction Aggregate in the Monterey Bay Production-Consumption Region. 2021.
https://www.conservation.ca.gov/cgs/documents/publications/special-reports/SR_251-MLC-MontereyBayPCR-2021-Plate01-MRZs-a11y.pdf

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

-
- a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
-

As discussed in Section 4.1.2.12 Existing Conditions, the site is located within MRZ-1 and therefore there are no known mineral resources onsite. The proposed project would not result in the loss of a known mineral resource. **(No Impact)**

-
- b) Would the project 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?
-

The project site has not been identified as a locally important mineral resource site in Santa Cruz County's General Plan/LCP, or in any other land use plan. Therefore, the project would not result in the loss of an important mineral resource recovery site. **(No Impact)**

4.13 Noise

The following discussion is based in part upon a Noise Assessment Memo completed February 6th, 2025, by Illingworth & Rodkin, Inc. The report is included as Appendix C of this Initial Study.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq} , DNL, or CNEL.⁷⁷ These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

⁷⁷ L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq} .

4.13.1.2 Regulatory Framework

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 4.13-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83

Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual*. September 2018.

State

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn} /CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

For commercial uses, CALGreen (Section 5.507.4.1 and 5.507.4.2) requires that wall and roof-ceiling assemblies exposed to the adjacent roadways have a composite sound transmission class (STC) rating of at least 50 or a composite outdoor/indoor transmission class (OITC) rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the commercial property falls within the 65 dBA L_{dn} or greater noise contour for a freeway or expressway, railroad, or industrial or stationary noise source. The state requires interior noise levels to be maintained at 50 dBA $L_{eq(1-hr)}$ or less during hours of operation at a proposed commercial use.

Local

County of Santa Cruz General Plan/LCP

Various policies in the County of Santa Cruz General Plan/LCP have been adopted for the purpose of “minimizing noise impacts on human activity to ensure the health and safety of the community.”

Policies in support of this goal that apply to the project are as follows:

Policy	Description
9.2.1	Require acoustical studies for all new development projects that may affect the existing noise environment affecting sensitive land uses and receptors and that may not conform to the Normally Acceptable Noise Exposure in Table 9-2.
9.2.2	Require site-design and noise reduction measures for any project, including transportation projects, that would cause significant degradation of the noise environment due to project effects that could: (a) Increase the noise level at existing noise-sensitive receptors or areas by 5 dB or more, where the post-project CNEL or DNL will remain equal to or below 60 dB; (b) Increase the noise level at existing noise-sensitive receptors or areas by 3 dB or more, where the post-project CNEL or DNL would exceed 60 dB; This policy shall not be interpreted in a manner that would limit the ability of the County to require noise-related mitigation measures or conditions of approval for projects that may generate lesser increases than the above. Special consideration may also be applied to special events or activities subject to permit requirements, or to land use development permits for uses and activities exempted from County noise control regulations.

Santa Cruz County Code

Chapter 13.15, Noise Planning, of the SCCC regulates, “noise generation and noise exposures by applying standards through land use planning and permitting, incorporating mitigation into project design to prevent unhealthful conditions, and enforcement to address violation of permit conditions.” However, noise produced by entertainment or special events is specifically exempted from the code as follows:

13.15.040 Exemptions.

(C) Entertainment or Special Events. The provisions of this chapter shall not apply to those reasonable sounds emanating from authorized school bands, school athletic and school entertainment events, and occasional noncommercial private outdoor or indoor gatherings and community events, conducted between the hours of 8:00 a.m. and 10:00 p.m. or the applicable permitted timeframe, in compliance with Chapter 8.30 SCCC, Noise, (governing offensive noise) and as long as any applicable requirements for special event permits or temporary use permits are met.

Offensive noise is defined in Chapter 8.30, Noise, of the SCCC as:

(B) “Offensive noise” means any noise which is loud, boisterous, irritating, penetrating, or unusual, or that is unreasonably distracting in any other manner such that it is likely to disturb people of ordinary sensitivities in the vicinity of such noise, and includes, but is not

limited to, noise made by an individual alone or by a group of people engaged in any business, activity, meeting, gathering, game, dance, or amusement, or by any appliance, contrivance, device, tool, structure, construction, vehicle, ride, machine, implement, or instrument.

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

(1) Loudness (Intensity) of the Sound.

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

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

(ii) In excess of 75 decibels at the edge of the property line of the property from which the sound is broadcast, as registered on a sound measuring instrument meeting the American National Standard Institute's Standard S1.4-1971 (or more recent revision thereof) for Type 1 or Type 2 sound level meters, or an instrument which provides equivalent data.

4.13.1.3 Existing Conditions

The project site consists of existing athletic fields on the SLV campus. The SLV campus is located in a residential area. The closest sensitive receptors to the project site are the single-family residences located directly east of the SLV campus on Highway 9.

The school currently hosts all sporting events during daylight hours. Football games are played on Saturdays, in late morning or early afternoon. In the past, the school played night football games on Friday or Saturday evenings as away games instead of on-campus; this typically occurs several times per season but varies each year. For the football games held on campus, attendance ranges from 500 attendees for most football games to up to 1,000 attendees for a rivalry or homecoming game. All other sporting events (e.g., baseball and softball games) and special events are currently held on campus during daylight hours on weekdays. The approximate attendance for these other events is up to 200 people.

The predominant noise sources contributing to ambient noise levels in the project area are transportation-related noise sources from vehicle traffic along Highway 9. The Santa Cruz County General Plan estimates that noise levels along Highway 9 are generally in the range of 55 to 60 dB

DNL⁷⁸ (essentially equal to 55 to 60 dBA CNEL). Resultant existing noise levels from traffic and football games held at the SLV campus is estimated at 57 dBA CNEL and the resultant existing noise levels from traffic and baseball and softball games is estimated at 55 dBA CNEL.

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a) 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) 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?	☐	☐	☐	☒
a) Would the project result in 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?				

Construction Noise

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, timing and duration of noise-generating activities, and distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Project construction would occur over a period of six months for the construction of the lights and PA system, and three to six months for the construction of the bleachers, press boxes, restroom, and snack shack. Construction activities would include materials delivery, excavation for pole

⁷⁸ Santa Cruz County General Plan.

https://cdi.santacruzcountycalifornia.gov/Portals/35/CDI/Planning/Policy/GeneralPlanTownPlans/General%20Plan%20Chapters/GP_Chapter%209_Noise.pdf.

foundation installation, trenching and boring for electrical conduit installation, installation via hydraulic crane of the lighting poles, mounting of the luminaires, and restoration of disturbed surfaces, including pavement and landscaping that was removed during excavation and trenching. Typical construction equipment would be used, such as an excavator, boring machine, concrete truck and pump, and a crane for pole installation and luminaire mounting, as well as semi-trucks for materials delivery. Construction would occur during the allowable hours set forth in the SCCC for nonresidential properties. In these areas, construction is permitted between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 6:00 p.m. on Saturdays.

Typical noise levels for different construction equipment at a distance of 50 feet are shown in Table 4.13-2 below.

Table 4.13-2: Typical Construction Equipment Noise Levels at 50 Feet

Equipment Category	L_{max} Level (dBA)^{1,2}	Impact/Continuous
Arc Welder	73	Continuous
Auger Drill Rig	85	Continuous
Backhoe	80	Continuous
Bar Bender	80	Continuous
Boring Jack Power Unit	80	Continuous
Chain Saw	85	Continuous
Compressor ³	70	Continuous
Compressor (other)	80	Continuous
Concrete Mixer	85	Continuous
Concrete Pump	82	Continuous
Concrete Saw	90	Continuous
Concrete Vibrator	80	Continuous
Crane	85	Continuous
Dozer	85	Continuous
Excavator	85	Continuous
Front End Loader	80	Continuous
Generator	82	Continuous
Generator (25 KVA or less)	70	Continuous
Gradall	85	Continuous
Grader	85	Continuous
Grinder Saw	85	Continuous
Horizontal Boring Hydro Jack	80	Continuous
Hydra Break Ram	90	Impact
Impact Pile Driver	105	Impact
Insitu Soil Sampling Rig	84	Continuous
Jackhammer	85	Impact
Mounted Impact Hammer (hoe ram)	90	Impact
Paver	85	Continuous
Pneumatic Tools	85	Continuous

Equipment Category	L _{max} Level (dBA) ^{1,2}	Impact/Continuous
Pumps	77	Continuous
Rock Drill	85	Continuous
Scraper	85	Continuous
Slurry Trenching Machine	82	Continuous
Soil Mix Drill Rig	80	Continuous
Street Sweeper	80	Continuous
Tractor	84	Continuous
Truck (dump, delivery)	84	Continuous
Vacuum Excavator Truck (vac-truck)	85	Continuous
Vibratory Compactor	80	Continuous
Vibratory Pile Driver	95	Continuous
All other equipment with engines larger than 5 HP	85	Continuous
Notes: ¹ Measured at 50 feet from the construction equipment, with a “slow” (1 sec.) time constant. ² Noise limits apply to total noise emitted from equipment and associated components operating at full power while engaged in its intended operation. ³ Portable air compressor rated at 75 cfm or greater that operates at greater than 50 psi.		

As shown in Table 4.13-2, excavators, cranes, boring jack power units, and concrete pumps would be anticipated to generate noise levels of 80 to 85 dBA L_{max} at a distance of 50 feet. The nearest resident is located approximately 130 feet east of the closest construction point for the softball field. Construction noise levels drop off at a rate of about six dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain can provide an additional five to 10 dBA noise reduction at distant receptors.

While construction noise levels generated by the project would exceed ambient levels by five dBA, construction of the project would not occur for more than 12 months, which is the amount of time at which substantial construction noise increases would be considered significant. Moreover, standard construction best management practices would be implemented at the project site as follows:

Standard Measures

- Construction staging areas shall be established at locations that will create the largest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. If they must be located near

receptors, adequate muffling (with barriers or enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors.

- Utilize “quiet” air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers’ radios to a point where they are not audible at existing residences bordering the project site.

Given the short duration of construction, implementation of construction best management practices, and the fact that construction of the project would be limited to the allowable hours under the SCCC (between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 6:00 p.m. on Saturdays), impacts would be less than significant.

Operational Noise

Football Field Use

Sports games would occur on up to four nights of varsity/JV interscholastic competition per annual season, comprised of the annual seasons for football, boy’s and girls’ soccer (four games each), baseball and softball (four games each). JV football games would typically start at 3:00 PM, and Varsity football games would start at 6:30 PM and end by 10:00 PM. All other games would typically end by 8:30 PM. There would be no other events on the other fields during football games. Play-by-play commentary using the PA system would only be permitted during football games. All other athletic competitions would limit the use of the public address systems to announcements, warm-up music or similar uses without running commentary. Sports practices would occur Monday through Friday, concluding by 8:30 PM. Sports practices would not occur during weekend nights unless under unusual circumstances approved by the Superintendent or designee.

For the purposes of assessing a credible worst-case scenario for stadium use, noise data collected during a varsity football game for a previous school assessment (Mt. Pleasant High School in San Jose) were used to estimate noise levels expected from a homecoming football game at SLV. The noise data were adjusted to account for additional distance between the noise source and receptors, as the nearest residential receptors in the SLV project vicinity would be approximately 1,000 feet to the east and 1,200 feet to the north (as measured from the center of the football field). At 1,000 feet, varsity football noise levels would be expected to range from 47 to 57 dBA L_{eq} and from 52 to 67 dBA L_{max} . The noise levels produced by the homecoming varsity football game at SLV (1,000 spectators) would be below the 75 dB limit that defines “offensive noise” in the Santa Cruz County Municipal Code, and therefore, would be exempt from Chapter 13.15, Noise Planning, of the Santa Cruz County Municipal Code. Noise levels produced by typical varsity football games (500 spectators), boy’s and girls’ soccer (up to 200 spectators), and sports practices would be less given the reduced crowd sizes, and similarly exempt.

Since the project would allow for evening activities (between 7:00 PM and 10:00 PM), the daily average noise increase analysis conservatively uses CNEL. The CNEL includes a 5 dB penalty to account for people’s increased sensitivity to sounds during evening hours (i.e. after 7:00 PM), which is not included in the calculation of DNL. The use of CNEL in lieu of DNL results in a more

conservative assessment of noise impact since the DNL would tend to show a lower increase in noise as compared to use of CNEL.

To estimate the CNEL produced by the homecoming junior varsity and varsity football games at SLV under the lights, it was conservatively assumed that football related activities would produce average noise levels of 57 dBA Leq from 3:00 PM to 10:00 PM. The resultant CNEL noise level at the nearest residence due to this activity would be 55 dBA. Under existing conditions (i.e., no evening activities), the resultant CNEL produced by football related activities conducted in the afternoons is 52 dBA.

The Santa Cruz County General Plan/LCP estimates that noise levels along Highway 9 are generally in the range of 55 to 60 dB DNL (essentially equal to 55 to 60 dBA CNEL). Therefore, the resultant noise level from traffic and football is estimated at 57 dBA CNEL under existing conditions and up to 58 dBA CNEL under project conditions conservatively assuming that ambient traffic noise levels are 55 dBA CNEL at the nearest residences. The project would not produce noise levels exceeding the normally acceptable threshold or result in a substantial increase of noise levels at the nearest sensitive receptors. Noise levels produced by typical junior varsity/varsity football games, boy's and girls' soccer, and sports practices would be less given the reduced crowd sizes, and similarly would not result in noise levels exceeding the normally acceptable threshold or a substantial increase noise levels at the nearest sensitive receptors.

Baseball/Softball Field Use

For the purposes of assessing a credible worst-case scenario for the baseball and softball fields, noise data collected during baseball and softball games for previous little league assessments were used to estimate noise levels expected from baseball and softball games at SLV. The noise data were adjusted to account for additional distance between the noise source and receptors, as the nearest residential receptors in the SLV project vicinity would be as close as 300 feet to the east (as measured from the center of the infield). At this distance, softball noise levels produced by games on the near field would be expected to reach 47 dBA Leq and 55 dBA Lmax. If both softball fields and the baseball field were used simultaneously for games, noise levels would be expected to reach 50 dBA Leq and 55 dBA Lmax at the nearest residences to the east. The noise levels produced by baseball and softball would be below the 75 dB limit that defines "offensive noise" in the Santa Cruz County Municipal Code, and therefore, would be exempt from Chapter 13.15, Noise Planning, of the Santa Cruz County Municipal Code. Noise levels produced by practices would be less given the reduced crowd sizes, and similarly exempt.

To estimate the CNEL produced by baseball and softball games at SLV under the lights, it was conservatively assumed that these activities would produce average noise levels of 50 dBA Leq from 3:00 PM to 8:30 PM. The resultant CNEL noise level at the nearest residence due to this activity would be 46 dBA. When compared to existing conditions (i.e., no evening activities), the resultant CNEL produced by baseball and softball games held in the afternoons is 44 dBA. The resultant noise level from traffic and baseball and softball games is estimated at 55 dBA CNEL under existing conditions and up to 56 dBA CNEL under project conditions conservatively assuming that ambient

traffic noise levels are 55 dBA CNEL at the nearest residences. The project would not produce noise levels exceeding the normally acceptable threshold or result in a substantial increase of noise levels at the nearest sensitive receptors. Noise levels produced by baseball and softball practices would be less given the reduced crowd sizes, and similarly would not result in noise levels exceeding the normally acceptable threshold or a substantial increase noise levels at the nearest sensitive receptors.

For the reasons described above, the noise resulting from construction and operation of the project would result in a less than significant noise impact. **(Less than Significant Impact)**

-
- b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
-

The closest structures to the project site are residences located 130 feet east. Groundborne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in cosmetic damage to buildings in the proximity of the construction areas.

The construction activities proposed by the project would include materials delivery, excavation for pole foundation installation, trenching and boring for electrical conduit installation, installation via hydraulic crane of the lighting poles, mounting of the luminaires, and restoration of disturbed surfaces including pavement and landscaping that was removed during excavation and trenching.

Based on vibration levels presented in the Federal Transit Administration Manual for typical construction equipment⁷⁹, equipment associated with project construction would be anticipated to generate vibration levels of 0.001 to 0.05 in/sec PPV at a distance of 100 feet, well below the 0.3 in/sec PPV threshold. Construction vibration would not be anticipated to cause cosmetic or structural damage to the nearest buildings and would not be considered excessive. As construction moves away from the eastern property line, vibration levels would be even lower. Therefore, the project would not result in a significant impact due to construction vibration. **(Less than Significant Impact)**

-
- c) 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?
-

The project does not lie within an airport land use plan or within two miles of a public airport. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels. **(No Impact)**

⁷⁹ Office of Planning and Environment, U.S. Department of Transportation. *Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration*. September 2018.

4.14 Population and Housing

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.⁸⁰ The County of Santa Cruz's Housing Element and related land use policies were last updated in 2023.

4.14.1.2 *Existing Conditions*

The County of Santa Cruz, including the incorporated cities, had 107,617 housing units and a total population of 262,572 as of January 2024.⁸¹ The estimated population for the whole County by 2045 is 294,967.

SLV High School had an enrollment of 622 students for the 2023-2024 academic year while the District had 5,540 students enrolled.⁸²

⁸⁰ California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed January 10, 2025. <http://hcd.ca.gov/community-development/housing-element/index.shtml>.

⁸¹ California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties and the State*. May 2024.

⁸² California Department of Education. "2023-24 Enrollment by Grade." Accessed February 11, 2025. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=44698074436754&aggllevel=school&year=2023-24>.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

-
- a) Would the project 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)?
-

The project would allow for nighttime use of the SLV campus fields for sports practices, games, marching band activities, and special events. The project is local-serving and does not propose new homes or businesses. Therefore, the project would not 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. **(No Impact)**

-
- b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
-

The project site is within a school campus and does not contain residences. Project improvements are limited to the boundaries of the school and would not displace existing people from the site. The project would not create a need for replacement housing. For these reasons, there would be no impact from the proposed project onto existing housing or populations. **(No Impact)**

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

4.15.1.2 *Existing Conditions*

Fire Protection

Fire protection within Santa Cruz County is provided by 13 entities, including nine fire protection districts, two community service areas, and two city fire departments. Most fire protection agencies are supported by mutual aid agreements with other jurisdictions. Felton is served by the Felton Fire Department, which consists of one fire station with one fulltime employee, one parttime employee, and 28 volunteer firefighters. The Felton Fire Department had an average response time of eight minutes in 2021.

Additionally, 43% of the County consists of unincorporated lands outside a fire district or city that provides fire protection. This resulted in the formation of CSA 48, also known as Santa Cruz County

Fire. CSA 48 is a special district governed by the County Board of Supervisor. Santa Cruz County currently contracts with the California Department of Forestry and Fire Protection for the administration of CSA 48, including operational oversight.⁸³

The Felton Fire Department at 131 Kirby Street is located approximately one mile southeast of the project site.

Police Protection

Police protection in the unincorporated areas of the County are provided by the County Sheriff's Office. In 2020, the Sheriff's Office had 340 total employees: 176 peace officers, 99 correctional officers, and 65 professional staff. The closest sheriff station to the site is the San Lorenzo Valley Sheriff's Service Center located at 6062 Graham Hill Road, Suite A & B, approximately one mile southeast of the site. The County Sheriff's Office has indicated that the department is staffed at minimum levels and does not consider its department to be sufficiently staffed.

The California Highway Patrol (CHP) is responsible for patrolling state highways and county roadways, enforcing traffic regulations, responding to traffic accidents, and providing service and assistance to drivers in disabled vehicles. CHP maintains a mutual aid agreement with the Santa Cruz County Sheriff's Office and assists local governments during emergencies when requested. Santa Cruz County is located within the CHP Coastal Division, whose service area includes 325 miles along the Central Coast with 11 area offices, one resident post, two commercial vehicle inspection facilities, and three communication/dispatch centers. These facilities are staffed by nearly 700 uniformed and non-uniformed employees. The area office in Santa Cruz County (Office 720) is located at 10395 Soquel Drive in Aptos.⁸⁴

Schools

The project site is the San Lorenzo Valley High School campus. SLV High School had an enrollment of 622 students for the 2023-2024 academic year while the District had 5,540 students enrolled.⁸⁵

Parks

San Lorenzo Valley has ten local rural parks, three local rural/school facility parks, and four local rural/regional parks.⁸⁶ The nearest park to the project site is Felton Covered County Park, located on Graham Hill Road, approximately 0.9 mile south of the site, followed by Felton Discovery County Park, located at 6121 Gushee Street, approximately one mile south of the site, Henry Cowell State Park, located approximately 1.4 mile south of the site, and Highlands County Park, located at 8500 Highway 9, approximately 1.5 miles north of the site.

⁸³ Santa Cruz County. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

⁸⁴ Santa Cruz County. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

⁸⁵ California Department of Education. "2023-24 Enrollment by Grade." Accessed February 11, 2025. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=44698074436754&aggllevel=school&year=2023-24>.

⁸⁶ Santa Cruz County. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

Libraries

The nearest library is the Felton Library, located at 6121 Gushee Street, approximately 1.5 miles south of the project site.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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?	☐	☐	☐	☒

-
- a) 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 fire protection services?
-

The proposed project would not increase the population of the surrounding area, or the number of students enrolled at the project site. Therefore, the proposed project would not increase demand for public services, including fire protection services. Service ratios and response times of the Felton Fire Department and CSA 48 would not be affected. Thus, the proposed project would have no impact on the environment due to additional or altered fire protection facilities. **(No Impact)**

-
- b) 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 police protection services?
-

As stated above under Checklist Question a), the proposed project would not increase demand on public services. Police protection service ratios or response times would not increase as a result of the proposed project, and the proposed project would not necessitate additional or altered police protection facilities. Therefore, the proposed project would have no impact on the environment due to effects on police protection services. **(No Impact)**

-
- c) 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 schools?
-

The proposed project would allow nighttime use of the existing SLV High School recreational facilities to accommodate currently enrolled students. The operation of the proposed project would not increase enrollment, and would have no impact on school service ratios or other performance. Therefore, the proposed project would have no impact resulting from additional demand for school facilities. **(No Impact)**

-
- d) 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 parks?
-

As stated above under Checklist Question a), the proposed project would not increase demand for public services or necessitate additional governmental facilities. In fact, the proposed project would increase the utility of existing recreational facilities within the existing campus of SLV High School. For this reason, the proposed project would have no impact on the environment due to an increased need for public park facilities. **(No Impact)**

-
- e) 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 other public facilities?
-

Service ratios, response times, and other performance objectives of public services in the County of Santa Cruz would not be affected by the proposed project. The proposed project would not necessitate the alteration of existing public service facilities, or the construction of additional facilities. For these reasons, the project would not result in substantial adverse impacts due to provision of additional or altered government facilities. **(No Impact)**

4.16 Recreation

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

4.16.1.2 *Existing Conditions*

According to the Santa Cruz County General Plan/LCP, the San Lorenzo Valley has 17 existing parks and one proposed park. The nearest park to the project site is Felton Covered County Park, located on Graham Hill Road, approximately 0.9 mile south of the site, followed by Felton Discovery County Park, located at 6121 Gushee Street, approximately one mile south of the site, Henry Cowell State Park, located approximately 1.4 mile south of the site, and Highlands County Park, located at 8500 Highway 9, approximately 1.5 miles north of the site.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☐	☒
b) 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?	☐	☐	☒	☐

-
- a) 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?
-

The project would not result in an increase in student enrollment or staff on-site. As a result, the demand for neighborhood and regional parks or other recreational facilities would remain unchanged when compared to existing conditions. **(No Impact)**

- b) 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?
-

The project would include the installation and operation of field lights and an upgraded PA system at the SLV football, softball, and baseball fields. Additionally, the project would replace the aging bleachers for all three fields, construct a restroom and snack shack between the softball and baseball fields, and construct two press boxes attached to the softball and baseball bleachers. The proposed project would allow for the nighttime use of the previously mentioned fields. The potential environmental impacts from construction and operation of the on-site improvements to recreational facilities are encompassed within analysis in this Initial Study. The proposed project would not require the construction or expansion of offsite recreational facilities that could result in adverse impacts to the physical environment. **(Less than Significant Impact)**

4.17 Transportation

The following discussion is based in part upon a Traffic Operations Study completed January 23rd, 2025, by Hexagon Transportation Consultants, Inc. The report is included as Appendix D of this Initial Study.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by the Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Caltrans District 5 Active Transportation Plan

The District 5 Active Transportation Plan advances the vision statement and goals in Toward an Active California, the statewide bicycle and pedestrian plan, and is part of a comprehensive planning process to identify locations with walking and bicycling needs in each Caltrans district across California. This plan includes a prioritized list of bicycle and pedestrian needs along and across the state highway system to help identify opportunities to incorporate bicycle, pedestrian, and transit improvements into projects. The plan is not intended to be a comprehensive list of specific bicycle and pedestrian construction projects and improvements, but to inform the project development process, during which specific improvement concepts and related priorities will be evaluated. It is also not static; data and information in this plan will be periodically updated in coordination with partners and communities.

Metropolitan Transportation Plan/ Sustainable Communities Strategy

AMBAG is required to produce certain documents that maintain the region's eligibility for federal transportation assistance, which include the Metropolitan Transportation Plan (MTP). AMBAG coordinates the development of the MTP with regional transportation planning agencies (San Benito County Council of Governments, Santa Cruz County Regional Transportation Commission [SCCRTC], and the Transportation Agency for Monterey County), transit providers (San Benito County Local Transit Authority, Monterey Salinas Transit, and METRO), MBARD, state and federal governments, and organizations having interest in or responsibility for transportation planning and programming. The Sustainable Communities Strategy is part of the MTP and demonstrates land use and transportation measures that will be used to meet the regions' GHG emission reduction targets as established by CARB.

Regional Transportation Plan

As the regional transportation planning agency (RPTA) for Santa Cruz County, the SCCRTC is responsible for developing, implementing and regularly updating the Regional Transportation Plan (RTP) for Santa Cruz County. The RTP is a state-mandated plan that identifies transportation needs in Santa Cruz County over the next 20 or more years. It estimates the amount of funding that will be available over this time frame and identifies a financially constrained priority list of projects. Projects identified in the 2040 RTP include maintenance of and improvements to local roadways, highways, bicycle and pedestrian facilities, transit service, rail, specialized transportation for seniors and people with disabilities, and transportation demand management programs.

The Santa Cruz County RTP is also incorporated into AMBAG's tri-county MTP/SCS, which covers the counties of Santa Cruz, Monterey and San Benito. The Santa Cruz County RTP must be consistent with and plan for a transportation system that supports the SB 375-mandated SCS for reducing GHG emissions, which is included in the AMBAG MTP/SCS.

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to transportation and are applicable to the proposed project:

Policy	Description
AM-1.1.1	Vehicle Miles Traveled Impacts. Maintain a VMT threshold that best supports statewide and regional greenhouse gas reduction goals as determined by the best available data and modeling practices.
AM-5.2.3	Limiting Traffic Volumes. Seek to limit traffic volumes and speeds in residential neighborhoods through traffic calming measures without reducing connectivity to adjacent neighborhoods and commercial areas.
AM-6.1.1	Fire and Emergency Response Access. Design adequate roadway infrastructure for fire and emergency response safety including safe access by emergency response vehicles, visible street signs, and water supplies for structural fire suppression.

AM-6.2.1	Level of Service (LOS) Criteria. Require development projects to provide multimodal roadway improvements necessary to achieve a minimum level of service (LOS) of “D”, except for those where a lesser LOS has been accepted by the County pursuant to the criteria specifically identified in Table 3-2 of the General Plan. When development is proposed on roads where a LOS E or F standard has been accepted, require feasible mitigation in the form of road improvements, a fair share contribution to a road improvement program, or other in-lieu mitigation for the transportation system.
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County of Santa Cruz VMT Threshold

The County of Santa Cruz adopted a VMT threshold in 2020 and has published guidelines for the implementation of SB 743 as it pertains to VMT. Similar to what is described in the OPR Technical Advisory, the County’s VMT threshold generally establishes that a project exceeding a level of 15 percent below the County-wide average VMT may result in a significant transportation impact. The County Guidelines indicate that the VMT analysis process is based on the type of land use and can be screened out for a less than significant transportation impact based on a variety of factors, including small projects, projects near high quality transit, local-serving retail, affordable housing, local essential services, map-based screening, and specified redevelopment projects.⁸⁷

If a project is unable to be screened out and is not within an area where average VMT is below or at the County’s VMT threshold level as indicated by the map-based screening figures located within the County’s VMT guidelines, then further analysis is required by utilizing the County’s “Sketch Planning Tool” or otherwise having a qualified transportation consultant analyze the projects VMT.

The existing regional per capita VMT in the AMBAG region is 22.4. In 2019, the County’s residential per capita VMT within the unincorporated portion of Santa Cruz County was 12.6. The per capita VMT per employee within the unincorporated county was 11.9.⁸⁸

4.17.1.2 *Existing Conditions*

Access to the site is provided by Highway 9. Highway 9 is a 35-mile long, two-lane road stretching from State Route 1 in Santa Cruz to State Route 17 in Los Gatos.

The SLV campus school property frontage along Highway 9 does not consist of sidewalks, however, there is a signalized crosswalk. A dirt path parallel to Highway 9 connects SLV to the neighboring commercial property located at 6965 Highway 9. Bus stops are located at the entrance to SLV on Highway 9. Bicyclists share the roadway with vehicles.

⁸⁷ County of Santa Cruz. Analyzing Vehicle miles Traveled for CEQA Compliance. SB 743 Implementation Guidelines for the County of Santa Cruz. Updated May 2021.

⁸⁸ County of Santa Cruz. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐
a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?				

As discussed in Section 3.1 Project Description, the proposed field lights would shift the timing of games and events into the evening, but the number of attendees at these events is not anticipated to change from existing levels. An increase in the number of sporting events (one to two additional events per year) would occur, as the installation of the stadium lights would allow the night football games currently played at other stadiums to be played on the SLV campus instead. As described in Section 2.2.1 Existing Development, the highest attendance for football games is currently 1,000 attendees for a rivalry or homecoming game, and 500 attendees for most football games. All other sporting events would have up to 200 attendees. Therefore, there could be a slight increase of people traveling to the SLV campus a few nights per year to attend these events, resulting in a slight increase of pedestrians, bicyclists, transit-use, and vehicles circulating the SLV campus on these evenings. The project would not increase roadway capacity, generate a substantial increase in traffic, or change traffic patterns that could cause an impact to the circulation system including transit, roadway, bicycle, and pedestrian facilities.

General Plan Policy AM-6.2.1

While SB 743 requires jurisdictions to stop using congestion and delay metrics, such as LOS, as the measurement for CEQA transportation analysis, General Plan Policy AM-6.2.1 identifies a LOS standard for intersection within the County. The following discussion evaluates whether the project would conflict with General Plan Policy. The purpose of the discussion is to 1) identify whether the project would cause an increase in delay that would conflict with the General Plan Policy and therefore warrant physical improvements to restore adequate LOS conditions, and if so, 2) evaluate whether the physical improvements would result in environmental impacts.

The LOS effects resulting from the project were evaluated following the standards and methodologies set forth by the County. LOS is a description of traffic flow from the driver's perspective based on factors such as speed, travel time, delay, and freedom to maneuver. Six levels are defined, from LOS A (little or no delay) to LOS F (excessive delay). LOS E represents "at-capacity" operations. When traffic volumes exceed the intersection capacity, stop-and-go conditions result, and operations are designated as LOS F. Refer to **Error! Reference source not found.** for detailed information about the various LOS standard definitions.

The project's effects on LOS were analyzed at the following intersections around the project site:

1. Highway 9 and El Solyo Heights Drive (unsignalized)
2. Highway 9 and San Lorenzo Valley Elementary School Driveway (unsignalized)
3. Highway 9 and San Lorenzo Valley High School Driveway

The study intersections were evaluated under existing conditions and existing plus project conditions (refer to Appendix D for a description of these conditions).

Traffic conditions at all study intersections were analyzed for a Friday from 5:00 to 7:00 PM, which is when the traffic increase due to the project is expected to be the greatest.

The amount of traffic added to the roadway system by the project is estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. For project trip generation, project traffic was estimated based on data collected for a study done at Mitty High School in San Jose. Based on the rate of 3.24 persons per vehicle, a homecoming game is expected to generate 309 inbound trips and 31 outbound trips during the busiest hour of 5:00 P.M.

For project trip distribution and assignment, the directional distribution of project-generated traffic was estimated based on existing travel patterns on the surrounding roadway system. The peak-hour trips associated with the proposed project were added to the roadway network in accordance with the distribution patterns and the number of parking spaces in the parking lots within campus (four total).

The results of the intersection LOS analysis under existing conditions and existing plus project conditions are summarized in Table 4.17-1.

Table 4.17-1: Existing and Existing Plus Project Intersection Level of Service

Intersection	LOS Standard	Peak Hour	Existing		Existing plus Project	
			Average Delay	LOS	Average Delay	LOS
Highway 9 and El Solyo Heights Drive	D	PM	18.4	C	20.6	C
Highway 9 and San Lorenzo Valley Elementary School Driveway	D	PM	17.3	C	18.5	C
Highway 9 and San Lorenzo Valley High School Driveway	D	PM	6.8	A	9.8	A

In summary, the results show that all of the study intersections currently operate and are projected to continue to operate at acceptable levels of service during the peak hours with the project. Therefore, the proposed project would not have an adverse LOS effect on any of the study intersections and would be consistent with General Plan Policy AM-6.2.1. Refer to Appendix D for detailed information regarding the LOS analysis. Therefore, the proposed project would not conflict with adopted policies, plans, or programs addressing the circulation system, and the impact would be less than significant. **(Less than Significant Impact)**

-
- b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
-

As discussed in Section 3.1 Project Description, the project would include the installation and operation of field lights and an upgraded PA system at the SLV football, softball, and baseball fields. Additionally, the project would replace the aging bleachers for all three fields, construct a restroom and snack shack between the softball and baseball fields, and construct two press boxes attached to the softball and baseball bleachers. The project would not result in a change in student enrollment or employment on-site.

The estimated attendance for athletic competitions upon installation of the proposed field lights would vary by sport and other factors, such as level of competition (e.g. regular season vs. postseason) and weather conditions. As described in Section 2.2.1 Existing Development, under existing conditions, the highest attendance is typically for football games, with up to 500 attendees for most games, increasing to up to 1,000 attendees for a rivalry or homecoming game. All other sporting events would have up to 200 attendees. Football games currently take place during afternoon hours or off-site at various stadiums.

Per the County's Guidelines for SB 743 Implementation, the project would meet the screening criteria to presume a non-significant transportation impact. The project would meet the screening criteria of being a local essential service as a public K-12 school, based on the assumption that, like local-serving retail, the addition of local in-person services will reduce VMT given that trips to these locations will be made irrespective of distance given their non-discretionary nature.

With completion of the project, the existing night varsity football games currently held at other stadiums would be played on-campus, which would increase the number of sporting events hosted on campus by one to two games (as offsite games at other stadiums would no longer occur). The project would therefore reduce the number of sporting events held at other stadiums that SLV students and supporters currently travel to, which presumably require longer trips than would be required to access the SLV campus. This would potentially reduce the VMT of SLV athletes and their supporters, although the reduction would be miniscule. While the proposed field lights would shift the timing of games and events into the evening, the number of attendees at these events is not anticipated to change from existing levels. Therefore, with implementation of the project, VMT associated with the school would remain the same as or slightly less than existing conditions. **(Less than Significant Impact)**

-
- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
-

The project consists of improvements contained within the SLV campus and would not involve any roadway or driveway improvements. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. **(Less than Significant Impact)**

-
- d) Would the project result in inadequate emergency access?
-

The proposed project would not result in changes to surrounding circulation systems or established evacuation routes. Therefore, the proposed project would have a less than significant impact on emergency access. **(Less than Significant Impact)**

4.18 Tribal Cultural Resources

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a TCR, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a TCR or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
 - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
 - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

Local

Santa Cruz County General Plan/LCP

The Santa Cruz County General Plan/LCP contains the following policies which are specific to tribal cultural resources and are applicable to the proposed project:

Policy/Ordinance	Description
ARC-8.1.4 (LCP)	Archaeological Evaluations. Require the applicant for development proposals on any identified archaeological site to provide an evaluation, by a certified archaeologist, of the significance of the resource and what protective measures are necessary to preserve important and unique archaeological sites and to mitigate any impacts of proposed development consistent with General Plan /LCP Land Use Plan objectives and policies and California state law. Avoidance shall be the preferred mitigation measure.

ARC-8.1.5	Accidental Discovery of Archaeological Resources. If archaeological resources or human remains are discovered accidentally during grading or construction, the activity shall cease and the property owner shall notify the proper authority in accordance with the Native American Cultural Sites ordinance.
ARC-8.1.6 (LCP)	Environmental Review. Environmental review shall be required for any project with the potential to significantly impact archaeological or tribal cultural resources.

Santa Cruz County Code

Chapter 16.40.040 of the SCCC outlines the required procedure for accidental discovery of human remains of any age, or any artifact or other evidence of a Native American cultural site during preparation for, or the process of, excavating or otherwise disturbing the ground.

4.18.1.2 *Existing Conditions*

Santa Cruz County lies within the territory traditionally occupied by people called “Costanoan.” Many modern descendants are referred to as “Ohlone,” or by their specific tribal band. The Ohlone spoke eight separate dialects of the Penutian language family and lived between what is now Richmond in the north and Big Sur in the south. They were organized under approximately fifty autonomous polities or tribelets. The Awaswas Ohlone dialect was reportedly spoken within the northern portion of Santa Cruz County and the Mutsun dialect was spoken in the southern portion of Santa Cruz County at the time of European contact.

There are no known tribal cultural resources (TCRs) on the project site. As discussed in Section 4.5 Cultural Resources, the project area is approximately 435 feet from the San Lorenzo River. Rivers have a higher sensitivity to archaeological resources. While there is the potential that the project site could contain archaeological resources, the project area is already developed. It is unlikely that any pre-historic archaeological resources would be found, as excavation for the lights on the already developed site would not be deep or involve a large area. No known tribal cultural features, including sites, features, places, cultural landscapes or sacred places, have been identified on the project site based on available information.

At the time of preparation of the Santa Cruz County General Plan/LCP EIR, no AB 52 requests from local tribes were received by the County or the District. No tribes have submitted requests to the District to be notified of projects pursuant to AB 52, therefore no consultation with tribes has been required in connection with the proposed project.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐
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.	☐	☐	☒	☐

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Assembly Bill (AB) 52 requires lead agencies to complete formal consultations with California Native American tribes who have requested to be notified of projects during the CEQA process to identify tribal cultural resources that may be significantly impacted by a project. As discussed in Section 4.18.1.2 Existing Conditions, no tribes have sent written requests for notification of projects to the District under AB 52. There are no known tribal resources on the project site. However, there is the potential that unrecorded tribal cultural resources could be uncovered during construction of the project.

As described under Checklist Question b) of Section 4.5 Cultural Resources, should tribal cultural resources be discovered during ground disturbance, the project would implement standard measures in order to comply with General Plan policy (ARC-8.1.5), Chapter 16.40.040 of the SCCC, and California codes. Therefore, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource. **(Less than Significant Impact)**

-
- b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is 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?
-

As discussed above under checklist Question a), no tribal resources have been recorded at the project site. No tribes have sent written requests for notification of projects to the District under AB 52. In the unlikely event that human remains or other TCRs are discovered during project construction, implementation of the standard measures in Section 4.5 Cultural Resources would reduce the project's impact to a less than significant level. **(Less than Significant Impact)**

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The San Lorenzo Valley Water District adopted its most recent UWMP in June 2021.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the California Integrated Waste Management Board (CIWMB), required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels) by 2000 and thereafter. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a Water Supply Assessment (WSA) containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle released an analysis titled “Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals” in August 2020 (revised November 2020), which recommended maintaining the disposal reduction targets set forth in SB 1383.⁸⁹

California Green Building Standards Code

CALGreen establishes mandatory green building standards for all buildings in California. The code is updated every three years.⁹⁰ CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

⁸⁹ CalRecycle. “Analysis of the Progress Toward the SB 1383 Organic Waste Reduction Goals (DRRR-2020-1693).” Accessed January 10, 2025. <https://www2.calrecycle.ca.gov/Publications/Details/1693>.

⁹⁰ California Building Standards Commission. “California Building Standards Code.” Accessed January 10, 2025. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

4.19.1.2 *Existing Conditions*

Water Supply

The Town of Felton, including the SLV campus, is served by the San Lorenzo Valley Water District. The San Lorenzo Valley Water District relies on surface water and groundwater resources, including nine stream diversions, one groundwater spring, and eight active groundwater wells.⁹¹

Sanitary Sewer/Wastewater Treatment

Communities located within the rural areas of the County, primarily in the San Lorenzo Valley, are not connected to municipal wastewater infrastructure. Instead, they dispose and treat sanitary waste through individual private septic systems, known as Onsite Wastewater Treatment Systems (OWTS).

Stormwater Drainage

As discussed in Section 4.10 Hydrology and Water Quality, stormwater infrastructure onsite consists of a series of open V ditches connecting to drain inverts varying in size from eight to 12 inches. The inverts accumulate into collection vaults running easterly through campus to a 30-inch outflow pipe. Flows enter the County's storm drain system on Highway 9 and ultimately to the San Lorenzo Valley River and Monterey Bay.

Solid Waste

Santa Cruz County Recycling and Solid Waste Services (Recycling & Trash) is responsible for the operation and administration of solid waste diversion and disposal in the County. The County has two solid waste facilities; the Buena Vista Landfill, located west of the City of Watsonville at 1231 Buena Vista Drive, and the Ben Lomond Transfer Station, located in the San Lorenzo Valley at 9835 Newell Creek Road. Both facilities are operated by Recycling & Trash.

The Buena Vista Landfill is a 126-acre solid waste landfill facility with permitted green waste processing operation. The landfill has 61 acres available for disposal use and 1,947,631 cubic yards of remaining disposal capacity and is expected to reach capacity by 2030.⁹² After this landfill is closed, the refuse from the Unincorporated County will be transferred to the Monterey Regional Waste Management District's (MRWMD) 315-acre Monterey Peninsula Landfill, located approximately two miles north of the City of Marina in Monterey County. The MRWMD is expected to have capacity for approximately 90 more years.

⁹¹ San Lorenzo Valley Water District. "Your Water." Accessed February 19, 2025. <https://www.slvwd.com/your-water>.

⁹² This was the capacity left at the time of publication for the Santa Cruz County General Plan/LCP EIR in 2022.

The Ben Lomond Transfer Station is a 3.5-acre large-volume solid waste transfer/processing facility. The Ben Lomond Transfer Facility is permitted to receive and process a total of 300 tons per day of mixed municipal, green materials, tires, construction/demolition, and industrial waste. Processed waste from this facility is either diverted for reuse, recycling, or composting off-site and refuse is transferred to the Monterey Peninsula Landfill or Buena Vista Landfill. The Ben Lomond Transfer Station accepts an average of 118 tons of refuse and recyclable material daily.

4.19.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐
a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				

The proposed project would not create a new demand for natural gas or telecommunications facilities. The proposed lights and PA system would marginally increase the demand for electric

power at the SLV campus. However, this marginal increase would not necessitate the construction of new facilities or expansion of existing facilities.

Note that existing events on the campus occur during the afternoon, but the addition of the stadium lights would allow these events to occur during the nighttime. The stadium lights would facilitate a slight increase in sporting events and special events (approximately two per year), which would incrementally increase demand for water and wastewater treatment. The resulting increase in wastewater would occur intermittently for two large sporting events (i.e. nighttime football games that now occur at other stadiums) and the project would not require the construction of new facilities or expansion of existing water or wastewater facilities. Therefore, the impact would be less than significant. **(Less than Significant Impact)**

-
- b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
-

The proposed project would result in a minor increase in demand for water corresponding to the increase in sporting events hosted on campus. All varsity football games would be hosted on the SLV campus on Friday evenings, which would increase the number of sporting events hosted on campus by one to two games. The number of attendees at events would not change, as for the other events now occurring at the SLV campus, the time of the event would shift into the evening, but the attendees would not substantially increase.

The increase in sporting events would be minimal and would not require the construction of new or expanded water facilities, as discussed above in Checklist Question a). Additionally, these events would occur intermittently. For these reasons, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

-
- c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
-

The proposed project would result in a minor increase in demand for wastewater treatment corresponding to the increase in sporting events at the SLV campus, whereby all varsity football games would be hosted on the SLV campus on Friday evenings, which would increase the number of sporting events hosted on campus by one to two games. Events that currently occur on campus, such as football, baseball, and softball games, would have similar attendance rates to the proposed project and do not result in exceedances of wastewater treatment capacity. Therefore, the project's minor contribution to existing wastewater treatment demands would not result in an exceedance of capacity. **(Less than Significant Impact)**

-
- d) Would the project 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?
-

The proposed project would result in a minor increase in solid waste generation corresponding to the increase in sporting events at the SLV campus, whereby all varsity football games would be hosted on the SLV campus on Friday evenings, which would increase the number of sporting events hosted on campus by one to two games. Solid waste generated on-site would be disposed of at the Buena Vista Landfill, which has 1,947,631 cubic yards remaining and is expected to operate for another 90 years. Events that currently occur on campus, such as football, baseball, and softball games, would have similar attendance rates to the proposed project and do not generate solid waste in exceedance of state or local standards or the capacity of local infrastructure. **(Less than Significant Impact)**

- e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?
-

Per CALGreen requirements, the proposed project would be required to continue providing on-site recycling facilities, develop a construction waste management plan, salvage at least 75 percent of nonhazardous construction/demolition debris (by weight), and implement other waste reduction measures. Compliance with these existing regulations and programs would ensure that the proposed project would not result in significant impacts on solid waste disposal capacity in excess of state or local standards or in excess of the Buena Vista Landfill's capacity **(Less than Significant Impact)**

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

State

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

California Fire Code Chapter 47

Chapter 47 of the California Fire Code sets requirements for wildland-urban interface (WUI) fire areas that increase the ability of buildings to resist the intrusion of flame or burning embers being projected by a vegetation fire, in addition to systematically reducing conflagration losses through the use of performance and prescriptive requirements.

California Public Resources Code Section 4442 through 4431

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that uses an internal combustion engine; specify requirements for the safe use of gasoline-powered tools on forest-covered land, brush-covered land, or grass-covered land; and specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period, from April 1 to December 1 (Public Resources Code Section 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain appropriate fire suppression equipment (Public Resources Code Section 4427); and

- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (Public Resources Code Section 4431).

California Code of Regulations Title 14

The California Board of Forestry and Fire Protection has adopted regulations, known as SRA Fire Safe Regulations, which apply basic wildland fire protection standards for building, construction, and development occurring in a SRA. The future design and construction of structures, subdivisions and developments in SRAs are required to provide for the basic emergency access and perimeter wildfire protection measures discussed in Title 14.

Local

Fire Management Plans

CAL FIRE has developed an individual Unit Fire Management Plan for each of its 21 units and six contract counties. The CAL FIRE San Mateo – Santa Cruz Unit (CZU) developed the 2022 Strategic Fire Plan for the CZU, which covers the project area and addresses citizen and firefighter safety, watersheds and water, timber, wildlife and habitat (including rare and endangered species), unique areas (scenic, cultural, and historic), recreation, range, structures, and air quality. The plan includes stakeholder contributions and priorities and identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire issues. The plan is a planning and assessment tool that identifies and prioritizes pre-fire and post-fire management strategies and tactics meant to reduce the loss of values within the CZU.

County of Santa Cruz Local Hazard Mitigation Plan

The County Local Hazard Mitigation Plan (LHMP) 2021-2026 was prepared in accordance with requirements of FEMA. FEMA reviews and approves LHMPs and requires an update on a five-year cycle. The County LHMP identifies potential hazards in the County, including wildfire hazards. The plan provides hazard mitigation to implement actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Mitigation actions include both short-term and long-term activities that reduce the impacts of hazards, reduce exposure to hazards, or reduce effects of hazards through various means, including preparedness, response and recovery measures. Effective mitigation actions also reduce the adverse impacts and cost of future disasters.

The County LHMP also designates critical hazard areas of the County as areas subject to greater threat from wildfire, and identifies these areas based on slope, vegetation, ability to respond to fire threats, and localized weather conditions in order to assist with preparation of County hazard mitigation and response planning. The plan was last updated in September 2021.

Santa Cruz – San Mateo Community Wildfire Protection Plan

Community Wildfire Protection Plans (CWPPs) are authorized and defined in Title 1 of the Healthy Forests Restoration ACT of 2003. The 2018 Santa Cruz County San Mateo County CWPP identifies the risks and hazards associated with wildland fires in the WUI areas of San Mateo and Santa Cruz counties. The CWPP also identifies recommendations aimed at preventing and reducing both infrastructure and ecosystem damage associated with wildland fires. The CWPP documents suggested actions intended to reduce the risk to people, property, and the environment. Fuel reduction projects identified in approved CWPP receive priority for federal funds.

Buildings proposed to be built within the WUI shall comply with all WUI materials and construction methods per CBC Chapter 7A and CRC Section R337.⁹³ The applicant shall, prior to construction, provide sufficient detail to demonstrate that the building proposed to be built complies with this policy.

Operational Area Emergency Management Plan

The County Office of Emergency Services developed the Operational Area Emergency Management Plan (EMP) in October 2015. The EMP addresses the planned response to emergencies and incidents affecting the unincorporated areas of the County. The purpose of the EMP is to establish a comprehensive approach to emergency management and provide guidance to agencies within the operational area in the protection of public health and safety and preparing for or responding to incidents.

Santa Cruz County Office of Response, Recovery, and Resilience

The Santa Cruz County Office of Response, Recovery, and Resilience was created in December 2020 and serves as the emergency management office for responding to ongoing disasters.

4.20.1.2 *Existing Conditions*

Fire Protection

As discussed in Section 4.15 Public Services, fire protection within Santa Cruz County is provided by 13 entities, including nine fire protection districts, two community service areas, and two city fire departments. Most fire protection agencies are supported by mutual aid agreements with other jurisdictions. Felton is served by the Felton Fire Department, which consists of one fire station with one fulltime employee, one parttime employee, and 28 volunteer firefighters. The Felton Fire Department had an average response time of eight minutes in 2021.

⁹³ Santa Cruz County Community Development and Infrastructure. Wildland Urban Interface (WUI) Codes and Standards. Accessed March 11, 2025.

[https://cdi.santacruzcountycalifornia.gov/UPC/BuildingPermitsSafety/BuildingPermitsIndex/FireAgenciesandWildlandUrbanInterface\(WUI\)Requirements/WildlandUrbanInterface\(WUI\)Requirements.aspx](https://cdi.santacruzcountycalifornia.gov/UPC/BuildingPermitsSafety/BuildingPermitsIndex/FireAgenciesandWildlandUrbanInterface(WUI)Requirements/WildlandUrbanInterface(WUI)Requirements.aspx)

Additionally, 43% of the County consists of unincorporated lands outside a fire district or city that provides fire protection. This resulted in the formation of CSA 48, also known as Santa Cruz County Fire. CSA 48 is a special district governed by the County Board of Supervisor. Santa Cruz County currently contracts with the California Department of Forestry and Fire Protection for the administration of CSA 48 including operational oversight.⁹⁴

The Felton Fire Department at 131 Kirby Street is located approximately one mile southeast of the project site.

Fire Hazard Severity Zones and Wildland -Urban Interface Areas

CAL FIRE maps areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The project site is located within a high FHSZ in a State Responsibility Area⁹⁵ and a high FHSZ in a Local Responsibility Area, as shown on Figure 4.20-1.⁹⁶ Per CAL FIRE, Fire Hazard Severity Zone maps evaluate “hazard” not “risk”. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50 year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.⁹⁷

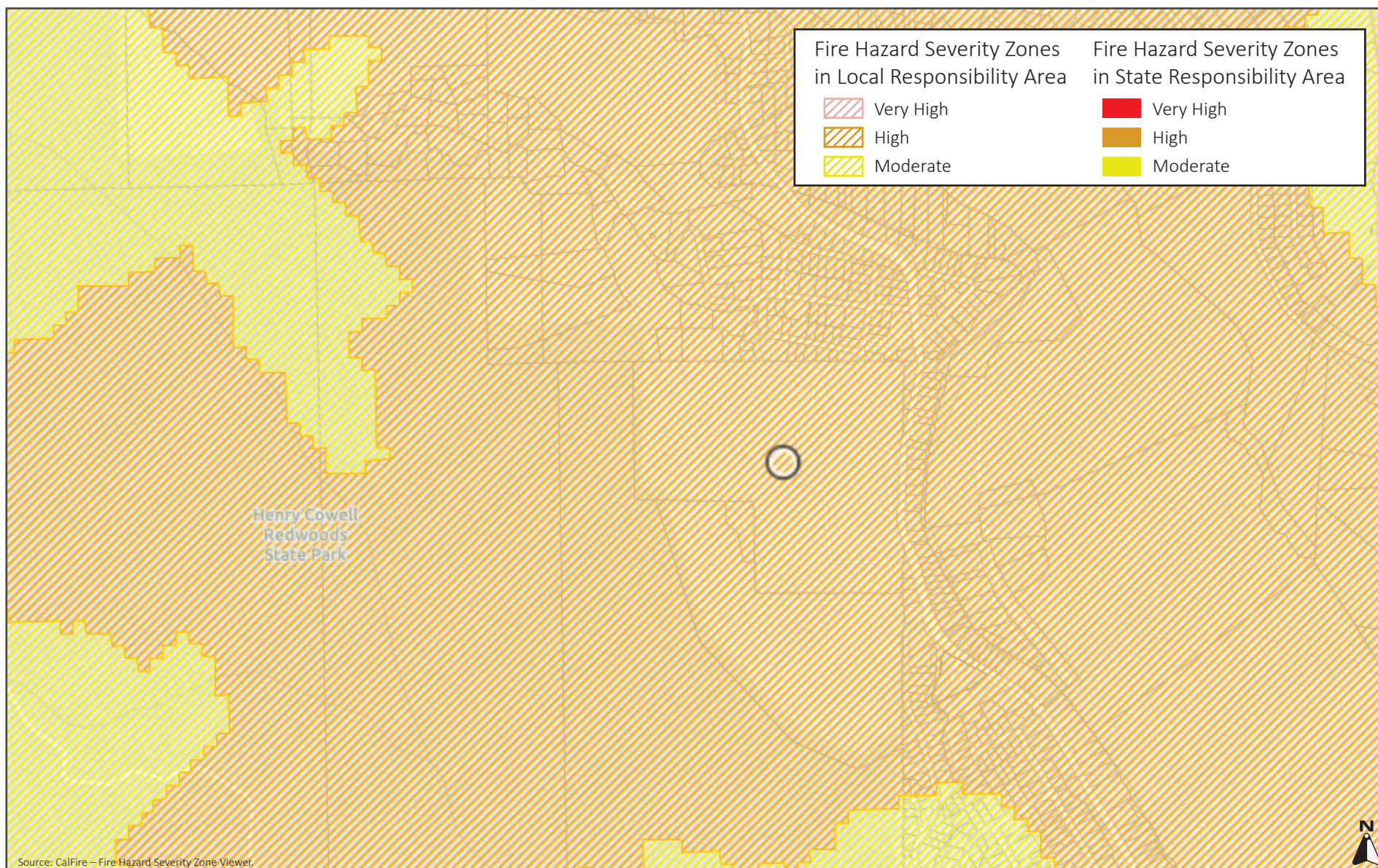
The project is also located in a wildland-urban interface area.

⁹⁴ Santa Cruz County. Sustainability Policy and Regulatory Update Draft Environmental Impact Report. April 2022.

⁹⁵ Cal Fire. Fire Hazard Severity Zones Maps. Accessed March 11, 2025. <https://www.fire.ca.gov/osfm/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-maps-2022>

⁹⁶ Santa Cruz County Fire Department. OSFM 2025 Fire Hazard Severity Zones. Accessed March 11, 2025. <https://countyfire.santacruzcountycalifornia.gov/FireResources/OSFM2025FireHazardSeverityZones.aspx>

⁹⁷ Cal Fire. Fire Hazard Severity Zones. Accessed March 11, 2025. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>



FIRE HAZARD SEVERITY ZONES

FIGURE 4.20-1

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐

-
- a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
-

The project includes the installation and operation of field lights and an upgraded public address (PA) system at the SLV football, softball, and baseball fields. Additionally, the project would replace the aging bleachers for all three fields, construct a restroom and snack shack between the softball and baseball fields, and construct two press boxes attached to the softball and baseball bleachers.

The project would not impair implantation of or interfere with an emergency evacuation plan. The Santa Cruz County Office of Response, Recovery, and Resilience serves as the emergency management office for responding to ongoing disasters. Evacuations are frequently a response to natural disasters in order to protect people from potential harm. People may be evacuated because they are in the direct path of a natural disaster or because emergency responders may lose the ability to rescue residents due to road closures. The County uses a variety of methods to notify residents when an evacuation is necessary. These include 911 calls, text or phone messages through Code Red, and/or door to door notifications. Evacuation areas are determined by the incident command team, who are in charge of responding to the disaster. The project would be required to comply with adopted local, regional, and State plans and regulations addressing emergency access

and State plans and regulations addressing emergency access and, in particular, designs to minimize risks of exposure to wildfire hazards.

Construction and operation of the project, which would be done in accordance with County building and fire codes and regulations, would not impair implementation of or physically interfere with the County's EOP, which is not tied to access onto or through the project site. In addition, emergency vehicles would be able to access the site via Highway 9. As discussed under Checklist Question d) in Section 4.17 Transportation, the project would not result in inadequate emergency access. For these reasons, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

-
- b) Would the project, 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?
-

According to a study on the "Influence of Slope on Fire Spread Rate" conducted by the USDA Forest Service⁹⁸, slopes of zero to ten degrees do not contribute to acceleration of fire. The project site is relatively flat, with an elevation range of 330 to 350 feet above sea level (asl). Depending on the distance used to calculate slope, the hillside to the west of the project site could have a slope greater than ten percent, as the elevation approximately 200 yards west of the edge of the project site ranges from 500 to 560 feet asl. Therefore, the slope adjacent to the site may contribute to wildfire risk. Additionally, wind is a contributing factor to wildfire risk in the project as well as the long dry summers and highly flammable fuel throughout the area.

The project would avoid exacerbating wildfire risks by complying with the standards set forth in the California Public Resources Code Section 4442 through 4431, which include restrictions on the type of equipment that can be used in fire prone areas to reduce the risk of causing wildfire during construction activities (refer to Section 4.20.1.1). Additionally, the project would be constructed in accordance with current building and fire codes to ensure structural stability and safety. Shifting the time that existing sporting events would occur at the SLV campus from the afternoons to the evenings under lights, as well as increasing the number of sporting events hosted on campus by one to two games, would not substantially increase the risk of wildfire.

Therefore, the project would not exacerbate wildfire risks, and thereby expose project occupants to increased risk from pollutant concentrations due to a wildfire or the uncontrolled spread of a wildfire. **(Less than Significant Impact)**

⁹⁸ B.W. Butler, W.R. Anderson, and E.A. Catchpole. Influence of Slope on Fire Spread Rate. USDA Forest Service Proceedings RMRS-P-46CD. 2007. Accessed February 16, 2024. [Influence of slope on fire spread rate | US Forest Service Research and Development \(usda.gov\)](#)

-
- c) Would the project 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?
-

Access to the SLV campus would continue to be provided via existing driveways on Highway 9. The project would connect to existing utilities. Project construction would comply with the standards set forth in the California Public Resources Code Section 4442 through 4431. Thus, the project would not include infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. **(Less than Significant Impact)**

-
- d) Would the project 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?
-

As discussed in Section 4.7 Geology and Soils, the project site is not susceptible to significant risk of landslides.⁹⁹ The project would involve a minimal amount of grading on previously disturbed areas, making potential impacts related to slope instability highly unlikely.

The project consists of campus improvements that would not significantly increase runoff or cause significant drainage changes. As discussed in Section 4.10 Hydrology and Water Quality, the project would result in a minor increase in impervious surfaces and would not alter the drainage pattern significantly. The project would be reviewed by the County and fire agencies to ensure the project design would minimize and not exacerbate wildland fire hazards. Therefore, the project would not 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. **(Less than Significant Impact)**

⁹⁹ County of Santa Cruz. *Landslide Hazard Zones*. Map. January 2021.

4.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) 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.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
a) 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, or eliminate important examples of the major periods of California history or prehistory?				

As discussed in the individual resource sections of this Initial Study, the proposed project would not degrade the quality of the environment with the implementation of the identified standard measures.

The only project within a mile of the project site that would be a part of cumulative conditions is the Caltrans State Route 9 Safety Improvements project (Highway 9 Improvements project), which would construct a sidewalk from the SLV High School toward the intersection of Route 9 and Graham Hill Road on the southbound side of Route 9.¹⁰⁰ The Highway 9 Improvements project is required to comply with all relevant regulations pertaining to biological and cultural resources.

¹⁰⁰ Caltrans. State Route 9 Felton Safety Improvements. [State Route 9 Felton Safety Improvements | Caltrans](#)

As discussed in Section 4.4 Biological Resources, the project would not result in significant impacts to sensitive habitats or any special-status species and would implement Mitigation Measure MM-BIO-1.1. To avoid impacts to as yet unidentified archaeological resources, human remains, and/or TCRs, the proposed project would implement standard measures discussed in Section 4.5 Cultural Resources.

Based on the above, with the implementation of standard permit conditions and mitigation measures, the project would not 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. **(Less than Significant Impact with Mitigation Incorporated)**

b) Does the project have impacts that are individually limited, but cumulatively considerable?

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects “that are individually limited, but cumulatively considerable.” As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” In addition, under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail.

The project would not impact agricultural or forestry resources or mineral resources, therefore, the project would have no contribution to cumulative impacts to these resources.

The project would not add new land uses or population in the County. As a result, the project would not induce substantial unplanned population growth, either directly or indirectly. The project would not generate cumulatively considerable demand for public services, recreational facilities, or utilities and service systems because it would not increase population, which is a principal cause of a need for increased public services, recreational facilities, and utilities and service systems.

The geographic area for cumulative aesthetic impacts for the project is the immediate surrounding area. The only project within a mile of the project site that would be a part of cumulative conditions is the Caltrans State Route 9 Safety Improvements project, which would construct a sidewalk from the SLV High School toward the intersection of Route 9 and Graham Hill Road on the southbound

side of Route 9.¹⁰¹ The Caltrans State Route 9 Safety Improvements project would not install lighting directly adjacent to the SLV Fields project site. Lighting installed by any future cumulative development within the geographic study area would be subject to the design standards that the project is subject to. Therefore, the project would not contribute to a cumulatively significant light and glare impact.

In general, an individual project's impact on air quality, energy, GHGs, and VMT are evaluated at a cumulative level. That is, if a project results in a significant impact to air quality (specifically criteria air pollutants), energy, GHGs, and VMT, the project would be considered to have a significant cumulative impact to those resources. The project would not result in significant emissions of criteria air pollutants or GHG emissions under MBARD thresholds and, therefore, would not make a substantial contribution to cumulative air quality or GHG emissions impacts (see sections 4.3 Air Quality and 4.8 Greenhouse Gas Emissions). Similarly, the discussion of the project's energy impact also reflects cumulative conditions, since the project's consumption of electricity, natural gas, and gasoline was assessed in comparison with consumption at the state and county level. Therefore, the proposed project would not make a substantial contribution to cumulative air quality, energy use, or GHG emissions impacts.

The project, in combination with the Highway 9 Improvements project, make up the cumulative projects for the local area. The project would result in less than significant impacts to aesthetics, hydrology and water quality, land use, population and housing, public services, recreational facilities, transportation, and utilities and service systems without the imposition of mitigation measures. The Highway 9 Improvements project is required to comply with all relevant regulations pertaining to aesthetics, hydrology and water quality, land use, population and housing, public services, recreational facilities, transportation, and utilities and service systems.

As noted in Section 4.17 Transportation, the project would meet the VMT screening criteria to presume a non-significant transportation impact and, therefore, the project would not contribute to cumulative VMT impacts. Furthermore, impacts associated with these resource areas are accounted for in the Santa Cruz County General Plan/LCP EIR. Under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail.

The geographic area for cumulative biology, cultural resources, TCRs, geology and soils, hazards and hazardous materials, and hydrology and water quality impacts is generally the surrounding area of the project sites because it would affect common resources and impacts would be limited to the immediate vicinity. The Santa Cruz County General Plan/LCP EIR concluded that future development, such as the proposed project, would comply with the existing state, regional, and local regulations including the MBTA, Fish and Game Code, NHPA, CRHR, California Native American Historical, Cultural, and Sacred Sites Act, Public Resources Code Sections 5097 and 5097.98, CBC, General Plan policies, and SCCC regulations identified in Section 4.4 Biological Resources, Section

¹⁰¹ Caltrans. State Route 9 Felton Safety Improvements. [State Route 9 Felton Safety Improvements | Caltrans](#)

4.5 Cultural Resources, 4.7 Geology and Soils, 4.9 Hazards and Hazardous Materials, and 4.10 Hydrology and Water Quality of this document to reduce impacts to biology, cultural resources, TCRs, geology and soils, hazards and hazardous materials, and hydrology and water quality to a less than significant level. The project would comply with the same regulations identified in the General Plan EIR via implementation of standard measures. For this reason, the project would not result in new or substantially more severe significant cumulative impacts than disclosed in the Santa Cruz County General Plan/LCP EIR for these resources. **(Less than Significant Impact)**

-
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?
-

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, hazardous materials, and noise. As documented in Sections **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**, and **Error! Reference source not found.** of this Initial Study, implementation of the General Plan policies and standard measures that have been identified would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified. **(Less than Significant Impact)**

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 6.0 Lead Agency and Consultants

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Section 7.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing material
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
ATCM	air toxic control measure
BAAQMD	Bay Area Air Quality Management District
Bay Area	San Francisco Bay Area
bgs	below ground surface
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CLUP	Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide

CO ₂ e	carbon dioxide equivalents
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GHGRS	Greenhouse Gas Reduction Strategy
GWh	gigawatt hour
GWP	Global Warming Potential
Habitat Plan	Santa Clara Valley Habitat Plan
HSWA	Hazardous and Solid Waste Amendments
ibid	Same source as previous footnote
L _{eq}	Energy-Equivalent Sound/Noise Descriptor
L _{max}	Maximum A-weighted noise level during a measurement period
LBP	lead-based paint
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
mpg	miles per gallon
MSL	mean sea level

MTC	Metropolitan Transportation Commission
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NOA	naturally occurring asbestos
NOD	Notice of Determination
NO _x	nitrogen oxides
NRHP	National Register of Historic Places
O ₃	ozone
PCB	polychlorinated biphenyls
PFC	perfluorocarbon
PDA	Priority Development Areas
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM ₁₀	particulate matter with a diameter of 10 microns or less
PM _{2.5}	particulate matter with a diameter of 2.5 microns or less
PPV	Peak Particle Velocity
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
SF ₆	sulfur hexafluoride
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board

SMP	Site Management Plan
SO _x	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
Title 24	Title 24, Part 6 of the California Code of Regulations
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
Williamson Act	California Land Conservation Act
WUI	wildland-urban interface
ZNE	zero net carbon emission