



Planning for Success.

MITIGATED NEGATIVE DECLARATION

SOQUEL UNION ELEMENTARY
SCHOOL DISTRICT DRAFT OPAL
CLIFFS PUBLIC WORKS PLAN

PREPARED FOR

Lozano Smith Attorneys at Law

Adopted April 21, 2010

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

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NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

In compliance with the California Environmental Quality Act (CEQA), the Soquel Union Elementary School District has undertaken environmental review for the proposed Soquel Union Elementary School District Opal Cliffs Public Works Plan, and intends to adopt a Mitigated Negative Declaration. The Soquel Union Elementary School District invites all interested persons and agencies to comment on the proposed Mitigated Negative Declaration.

Lead Agency	Soquel Union Elementary School District
Project Location	The 9.79-acre project site is located at 4400 Jade Street, west of 47th Street and south of Jade Street, in the City of Capitola coastal zone, Santa Cruz County, Assessor's parcel number 034-551-02.
Project Description	The proposed project is the Soquel Union Elementary School District Opal Cliffs Public Works Plan and its provisions for an Elementary School Public Works Project, which covers the construction in two phases of public elementary school facilities and infrastructure on the site. The Opal Cliffs Public Works Plan provides long-term and comprehensive guidance and policy direction for land use, improvements, operations and maintenance of the Soquel Union Elementary School District property known as the "Jade Street" or "Opal Cliffs" site located in the City of Capitola, Santa Cruz County.
Public Review Period	Begins – February 25, 2010 Ends – March 29, 2010
Proposed Mitigated Negative Declaration is Available for Public Review at this Location	Soquel Union Elementary School District 620 Monterey Avenue Capitola, CA 95010 (831) 464 5630
Address Where Written Comments May be Sent	Kathleen Howard, District Superintendant Soquel Union Elementary School District 620 Monterey Avenue Capitola, CA 95010

SOQUEL UNION ELEMENTARY SCHOOL DISTRICT DRAFT OPAL CLIFFS PUBLIC WORKS PLAN

Proposed Mitigated Negative Declaration

PREPARED FOR

Lozano Smith

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February 11, 2010



**PROPOSED
MITIGATED NEGATIVE DECLARATION
FEBRUARY 11, 2010**

**Soquel Union Elementary School District
Draft Opal Cliffs Public Works Plan
In Compliance with the
California Environmental Quality Act (CEQA)**

Lead Agency: Soquel Union Elementary School District

Project Proponent: Soquel Union Elementary School District
620 Monterey Avenue
Capitola, CA 95010
(831) 464 5630

Kathleen Howard, District Superintendent

Project Location: The 9.79-acre project site is located at 4400 Jade Street, west of 47th Street and south of Jade Street, in the City of Capitola coastal zone, Santa Cruz County, Assessor’s parcel number 034-551-02.

Project Description: The proposed project is the Soquel Union Elementary School District Opal Cliffs Public Works Plan and its provisions for an Elementary School Public Works Project, which covers the construction in two phases of public elementary school facilities and infrastructure on the site. The Opal Cliffs Public Works Plan provides long-term and comprehensive guidance and policy direction for land use, improvements, operations and maintenance of the Soquel Union Elementary School District property known as the “Jade Street” or “Opal Cliffs” site located in the City of Capitola, Santa Cruz County.

Public Review Period: Begins – February 18, 2010
Ends – March 22, 2010

Address Where Kathleen Howard, District Superintendent
Written Comments Soquel Union Elementary School District
May be Sent: 620 Monterey Avenue
Capitola, CA 95010

Proposed Findings: The Soquel Union Elementary School District is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.

The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency (Soquel Union Elementary School District) that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:

MITIGATION MEASURES

Air Quality

AQ-1. To control, to the greatest extent feasible, dust during grading, excavation and construction activities, Soquel Union Elementary School District will include the following MBUAPCD dust control measures into contracts for the proposed project:

- a. Water all active construction areas at least twice daily, or as required to control dust;
- b. Cover all trucks hauling dirt, sand, or loose material;
- c. Sweep streets within one day if necessary to remove dirt, sand, or loose material dropped from trucks hauling such material;
- d. Apply (non-toxic) chemical soil stabilizers on all unpaved access roads, parking areas and staging areas as well as on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
- e. Cover inactive storage piles;

- f. Limit traffic/equipment speed on unpaved surfaces to 15 mph, or less under windy conditions; and
- g. Plant vegetative ground cover in disturbed areas as soon as possible.

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SOQUEL UNION ELEMENTARY SCHOOL DISTRICT DRAFT OPAL CLIFFS PUBLIC WORKS PLAN

Initial Study

PREPARED FOR

Lozano Smith

Judd Jordan

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February 11, 2010

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A. BACKGROUND

Project Title	Soquel Union Elementary School District Draft Opal Cliffs Public Works Plan
Lead Agency Contact Person and Phone Number	Kathleen Howard, District Superintendent Soquel Union Elementary School District 620 Monterey Avenue Capitola, CA 95010 (831) 464 5630
Date Prepared	January 26, 2010
Study Prepared by	EMC Planning Group Inc. 301 Lighthouse Avenue, Suite C Monterey, CA 93940 Sally Rideout, Senior Planner Janet Ilse, Biologist/Senior Planner Richard James, AICP, Principal Planner
Project Location	4400 Jade Street, Capitola, California
Project Sponsor Name and Address	Soquel Union Elementary School District 620 Monterey Avenue Capitola, CA 95010
General Plan Designation	Community Facilities-School, Parks and Open Space
Zoning	Public Facilities, Coastal Zone Overlay: Park, School

Setting

The 9.79-acre project site is located at 4400 Jade Street, west of 47th Street and south of Jade Street, in the City of Capitola coastal zone, Santa Cruz County, Assessor's parcel number 034-551-02. The site lies approximately 69 feet above mean sea level with the Monterey Bay shoreline located about 800 feet south of the site. The site is located in a residential area of the City. Several residential neighborhoods are located around the site, including a residential neighborhood to the south, the Tradewinds Mobile Home Park to the west, a residential neighborhood to the north, and 47th Street and another mobile home park to the east. The Union Pacific Railroad right-of-way (formerly Southern Pacific Railroad) adjoins the southern boundary of the site. The site is accessible from Jade Street, to the north. The site is owned by the Soquel Union Elementary School District and is currently used as a community center and public park, known as Jade Street Park. Existing improvements on the site include the community center building, play structures, a restroom facility, two parking lots and a

community garden. A soccer field occupies much of the eastern portion of the site and a baseball diamond occupies much of the west side of the site. One basketball court and four tennis courts are located between the soccer and baseball fields, south of the central parking lot. Redwood trees line the southern boundary of the site; several more redwoods and liquidambar trees are located throughout the site. [Figure 1, Regional Location](#), presents the location of the City of Capitola. [Figure 2, Project Location](#), presents the location of the Opal Cliffs site within the context of the City of Capitola's coastal zone boundary. [Figure 3, Aerial Photograph](#), presents the relationship of the site and its amenities with adjacent uses. [Figure 4, Site Photographs](#), presents the visual characteristics of the site.

An adjoining northern parcel, owned by the Tradewinds Mobile Home Park, is used as public parking for the project site under a reciprocal sub-lease with the City of Capitola, which has allowed the Tradewinds Mobile Home Park to use a portion of the northwest corner of the site for storage. Public parking is available on this adjacent parcel between the community center and Jade Street, and is also available on the site between the community center and the community garden in a central parking lot. Vehicle access to the parking lots is available from Jade Street. Pedestrian access is also available from Jade Street, 47th Street and informally from the railroad right-of-way.

Description of Project

The proposed project consists of the Soquel Union Elementary School District Opal Cliffs Public Works Plan (hereinafter "Plan" or "District Plan") and its provisions for an Elementary School Public Works Project, which covers the construction in two phases of public elementary school facilities and infrastructure on the site. The draft District Plan is included in its entirety as [Appendix A](#), which is in a CD attached to the inside back cover of this initial study. The Plan, with its provisions for the new elementary school, is the proposed project (hereinafter "project"). The District Plan provides long-term and comprehensive guidance and policy direction for land use, improvements, operations and maintenance of the Soquel Union Elementary School District (SUESD) property known as the "Jade Street" or "Opal Cliffs" site located in the City of Capitola, Santa Cruz County. The District Plan policy guidance and implementation plan are consistent with the Coastal Act and have been prepared in conformance with the City of Capitola Local Coastal Program.



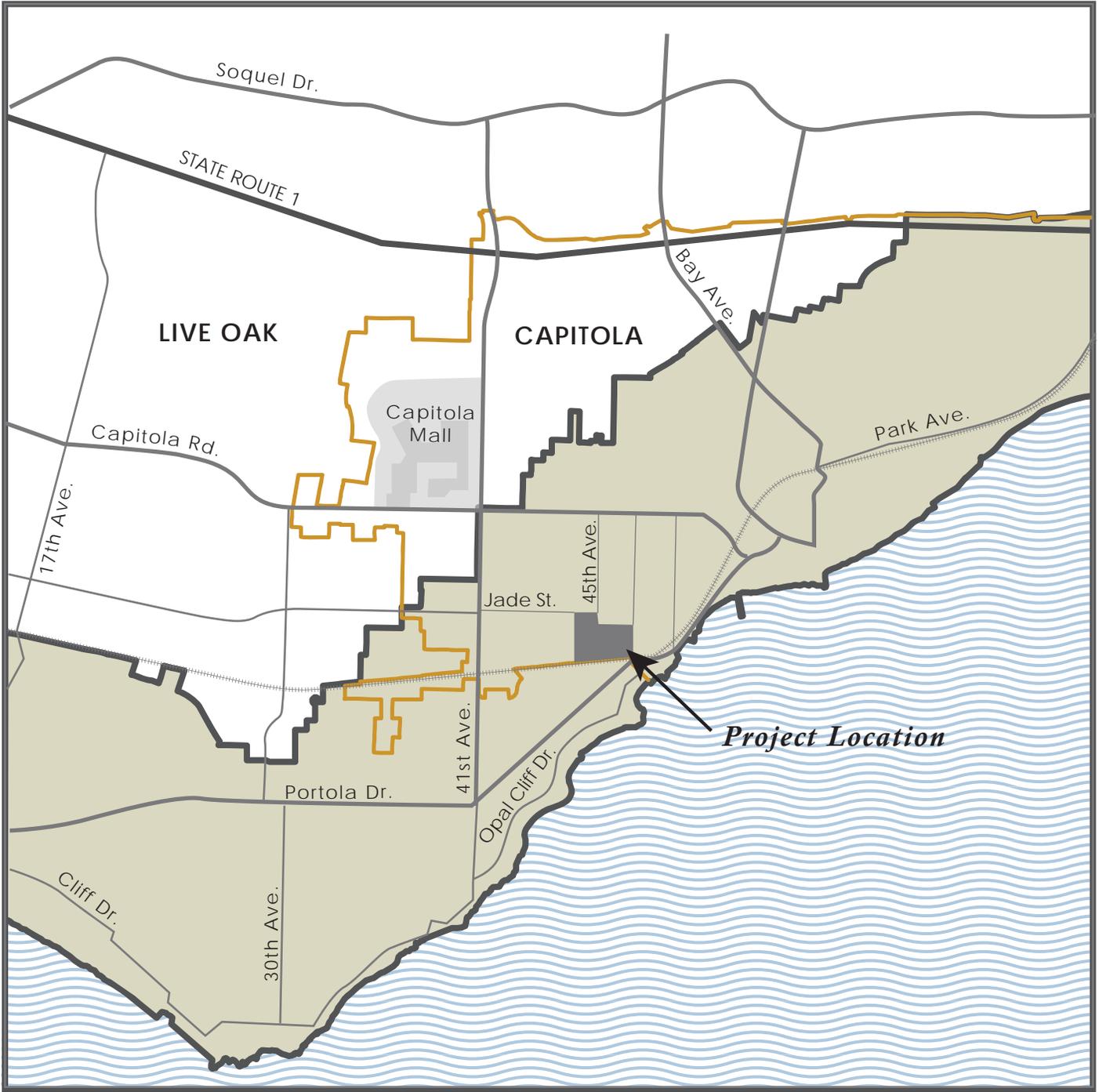
Not to Scale

Source: EMC Planning Group Inc. 2009



Figure 1
Regional Location

This side intentionally left blank.



Coastal Zone
 City Limits



Not to scale

Source: EMC Planning Group Inc. 2009

Figure 2

Project Location



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0 150 feet

----- Plan Boundary

Source: EMC Planning Group Inc. 2009,
Google Earth 2009



Figure 3
Aerial Photograph

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① Community Garden



② View Across Site From 47th Avenue



③ View North From East Side Of Soccer Field



④ Union Pacific Railroad



⑤ Baseball Diamond and Community Center



⑥ North Parking Lot

Source: EMC Planning Group Inc. 2010



Figure 4
Photographs
 SUESD Draft Opal Cliffs Public Works Plan Initial Study

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The project includes two phases of construction of classroom facilities and play areas, and reconfiguration of the central parking lot, on about 2.5 acres of the eastern portion of the site. The proposed elementary school buildings are intended to meet California High Performance School requirements, which are the equivalent of LEED-Certified silver to gold level buildings. The elementary school project consists of the construction of a pre-school, kindergarten and first grade to meet existing population demands within SUESD (Phase One), and could include expansion of the elementary school facility to a second through fifth grade (Phase Two) as well. Phase One school improvements would replace the community garden on the eastern portion of the site. Phase Two school improvements would add buildings and play areas into the area currently occupied by the soccer field. The south end of the field would remain intact as a turf play area.

For Phase One operations, SUESD anticipates enrollment of 40 preschool students and 40 elementary school students, with approximately eight teachers and staff. Phase Two operations would accommodate approximately 400 preschool and elementary students, and require 19-27 faculty members and staff. The District may use these school buildings for other educational purposes such as the District's independent study, assessment and testing, speech therapy and in-school suspension programs, which might involve different numbers of students and teachers. The Plan includes reconfiguration and expansion of the central parking lot capacity to accommodate each operational phase. The Plan permits continued public use of amenities on the site not in use by the District, including those portions of the site currently occupied by the community center, parking lots, existing playground, baseball diamond, and tennis courts, at least for the remainder of the original term of the terminated lease. The proposed Phase One improvements are presented in [Figure 5, Phase One Site Plan](#). The Phase Two improvements are presented in [Figure 6, Phase Two Site Plan](#).

Background

The Soquel Union Elementary School District purchased the 9.79 acre Jade Street, or Opal Cliffs, site as a future school site in 1956. The site is registered with the state Office of Public School Construction as a school site. The District constructed the restroom building, tennis courts, and a parking lot on the site in 1977 with approval of the Division of the State Architect, who supervises design and construction of public school facilities.

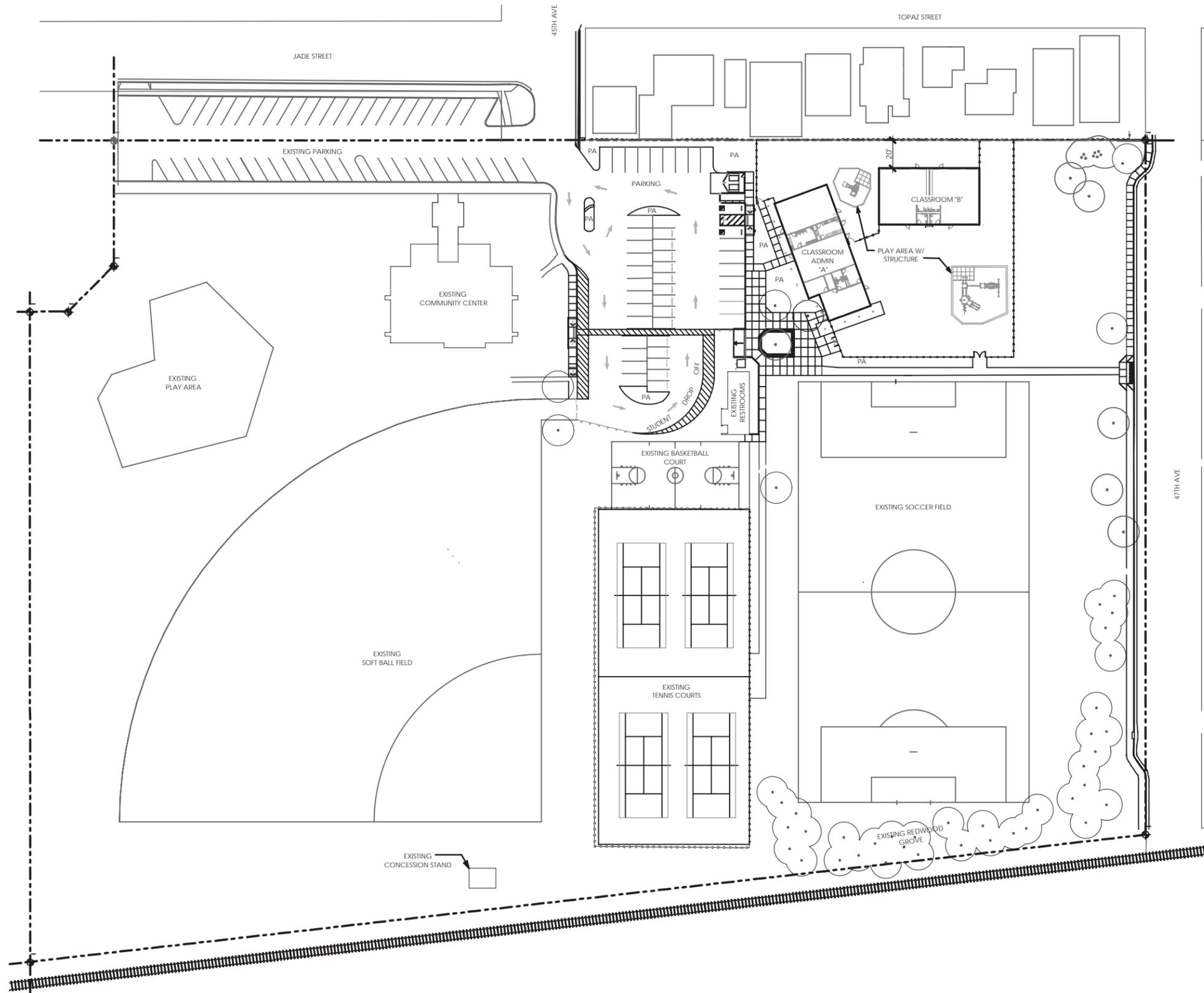
In 1982, based upon a spirit of cooperation and commitment to maximizing joint use potential of the property for schools and parks, the District and the City of Capitola ("City") entered into a lease under which the City developed a community center and further developed and maintained the recreational facilities on the site for use as a park and for school purposes. For example, the soccer field on the site is the home field for the New Brighton Middle School "Vikings" soccer team.

The lease as amended in 1985 and 1986 was for a term of fifty years or until the District gave the City twelve months written notice that the District required the site for a public school building, with the City retaining the right to continue use of the community center facility for fifteen years after the District gave such notice. The relationship between the City and the District became strained in 2000 when the District was in the process of planning to use a portion of the site for school buildings, but the City refused to vacate any portion of the site for use by the District. In July 2000, the District gave the City formal written notice that the District required the site for public school buildings. The District filed a "Complaint for Wrongful Occupation of Real Property; Ejectment" against the City, and the Court entered a Conditional Judgment of Ejectment stating that "the lease was terminated effective July 26, 2001" but that "given the spirit of cooperation and commitment to maximizing joint use potential that existed in 1986," the City has the right "to remain in possession during the original term of the lease until the District is ready to actually commence use of the property, with all necessary approvals, whether that be the movement of portable buildings on the property or the commencement of grading for a new school". A copy of the Court's Conditional Judgment of Ejectment is included as Appendix A of the Soquel Union Elementary School District Opal Cliffs Public Works Plan.

Other Public Agencies Whose Approval is Required

California Coastal Commission (Public Works Plan)

Regional Water Quality Control Board (NPDES General Construction Permit)

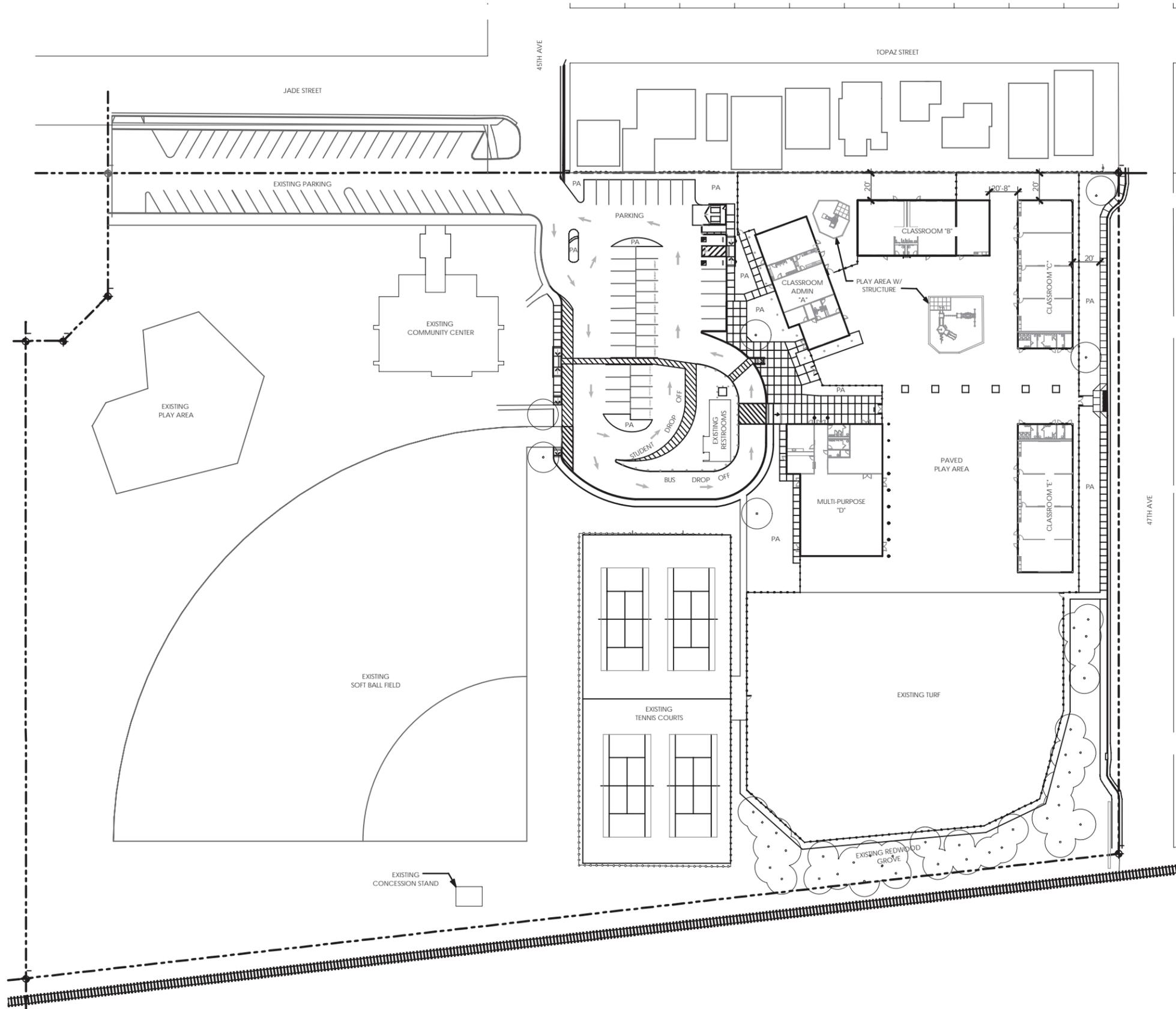


Source: EMC Planning Group Inc. 2009
Weston Miles Architects, Inc. 2008



Figure 5
Phase One Site Plan
SUESD Draft Opal Cliffs Public Works Plan Initial Study

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Source: EMC Planning Group Inc. 2009
 Weston Miles Architects, Inc. 2008



Figure 6
 Phase Two Site Plan
 SUESD Draft Opal Cliffs Public Works Plan Initial Study

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B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

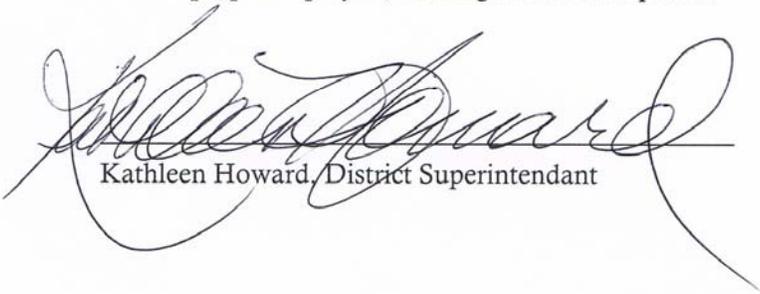
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture | <input type="checkbox"/> Hydrology/Water quality | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | |

C. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ✓ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Kathleen Howard, District Superintendent

2-15-10
Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

1. A brief explanation is provided for all answers except “No Impact” answers that are adequately supported by the information sources cited in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer is explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as a project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once it has been determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less-Than-Significant Impact with Mitigation Measures Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The mitigation measures are described, along with a brief explanation of how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier document or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
 - a. “Earlier Analysis Used” identifies and states where such document is available for review.

- b. “Impact Adequately Addressed” identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. “Mitigation Measures”—For effects that are “Less-Than-Significant Impact with Mitigation Measures Incorporated,” mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
7. “Supporting Information Sources”—A source list is attached, and other sources used or individuals contacted are cited in the discussion.
8. This is the format recommended in the CEQA Guidelines as amended October 1998.
9. The explanation of each issue identifies:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

1. AESTHETICS

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Have a substantial adverse effect on a scenic vista? (2,3,14,26)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? (2,3,14,26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. Substantially degrade the existing visual character or quality of the site and its surroundings? (2,3,14,26)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? (2,3,14,26)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>

Comments:

a,b. The site is not located in an area of the coastal zone identified as highly scenic by the City’s LCP and is not located within a state scenic corridor. The site is located inland of the shoreline and public views of the coast and Monterey Bay are not present from the site or the immediate vicinity; the nearest public views of the coast are located along Opal Cliff Drive, about 450 feet southeast of the site. Improvements to the SUESD property would not block or detract from public view to and along Capitola’s shoreline.

c. The project site is currently used as a public community park. According to the District Plan, the most prominent character-defining visual features of the property are its tree-lined playing fields, which provide a feeling of open space within the developed neighborhood.

The Plan includes provisions to avoid planting large trees between school buildings and existing residences to the north to preserve, to the extent feasible, existing views from those residences. Development of the project site and future maintenance activities would include landscaping and the periodic replacement of existing ornamental species, including trees as they reach the end of their natural lifespan. The resource value of the site is based primarily upon the use of the site by local residents for park and organized recreational activities, and, correspondingly the District Plan policies for visual resources are focused on maintaining the traditional scale and character of the neighborhood and

allowing continued use of the park facilities by the City to the extent consistent with use by the District at least during the remainder of the original term of the terminated lease. The Plan includes increased setbacks, height limits and landscaping features that promote neighborhood compatibility and the minimization of impacts to residences adjacent to the proposed school buildings and playground (Plan, page 4-5). The proposed elementary school project includes design features such as low profile buildings, increased setbacks, landscaping and lighting to ensure compatibility with adjacent uses in the neighborhood and immediately adjoining the site. Policies to mitigate potential conflicts between the school use and adjacent residences on Topaz Street are presented graphically in the District Plan Figure 10, Land Use Mitigation Site Plan, and are illustrated in Figure 11, Phase One Preliminary Landscape Plan, and Figure 12, Phase Two Preliminary Landscape Plan, of the District Plan. The proposed landscaping includes the use of drought-tolerant plant and turf species and low-growing shrubs and grasses in a landscaped buffer area between the residences on Topaz Street and the school facility (Plan, page 2-15). The Plan includes the following policy and implementation measures designed to minimize visual impacts on adjacent residences:

Policy PA-3. Minimize impacts to private views of the coast from the residences on Topaz Street, adjoining the north property line of the site.

Implementation PA-3.1. The District will restrict and maintain all plant materials within the landscaped area located between school buildings and adjacent residences on Topaz Street, to the maximum height of 20 feet, commensurate with the height of school buildings within 40 feet of the north property line of the site (Plan, page 4-9).

Policy LU-3. Create buffer standards for the proposed school that provide a transition to immediately adjacent residential uses. Buildings placed near the perimeter of the site shall complement the mass and scale of the neighborhood.

Implementation LU-3.1. The District will landscape a 20-foot buffer area between school buildings and the southern property line of residences along Topaz Street.

Implementation LU-3.2. The District will add a solid fence with a minimum six-foot height along the north property line of the site between school buildings and adjacent residences.

Implementation LU-3.3. Buildings will not exceed a single story nor a height of 20 feet within 40 feet of the southern property line of residences along Topaz Street.

Implementation LU-3.4. The District will orient school building entrances and other gathering points away from adjacent residences.

Upon implementation of these measures, potential impacts to visual resources in the project vicinity are considered less than significant. No mitigation measures are necessary.

- d. The proposed elementary school project includes lighting features to ensure compatibility with adjacent uses in the neighborhood and immediately adjoining the site. Primary uses of the school facility would occur during the daylight hours and substantial lighting of the school grounds at night is not proposed. The District Plan includes a Preliminary Lighting Plan, which shows the locations and luminescence standards for exterior lighting on the grounds and buildings. The lighting plan includes requirements to shield light fixtures and utilize down-lighting to reduce light and glare interference with adjoining uses and views of the night sky. Final lighting plans for each Phase would be approved by the SUESD Board prior to installation (Plan, page 2-15). The introduction of new sources of light and glare associated with the school use on the site is less than significant. No mitigation measures are necessary.

2. AGRICULTURE RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
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 nonagricultural use? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

a-c. The proposed project does not convert farmland to urban uses. The site is located in an established urban area and is developed with a community park. The park was first developed in 1981.

3. AIR QUALITY

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

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Conflict with or obstruct implementation of the applicable air quality plan? (14,20)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (14,19,20)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)? (14,19,20)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations? (14,19,20)	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people? (14,19,20)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
f. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (14,15,30,33,34)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>

Comments:

a,b. The project site is located in the North Central Coast Air Basin, which is comprised of Monterey, Santa Cruz, and San Benito counties. The Monterey Bay Unified Air Pollution Control District (MBUAPCD) is the agency with jurisdiction over the air quality regulation in the air basin. The 2008 Air Quality Management Plan (AQMP) outlines the steps necessary to reach attainment with the state standards of air quality for criteria pollutants. Automobiles are the primary generators of criteria pollutants, which include ozone (O₃), carbon monoxide (CO), nitrous oxides (NO_x), particulate matter (PM₁₀), and reactive organic gases (ROG). Consistency with the AQMP is determined by the effect of population increases resulting from new development. The Plan does not include residential uses and is consistent with the AQMP.

- b,c. **Construction-Related Impacts.** The North Central Coast Air Basin is in non-attainment for the state standard for PM₁₀. The proposed project would result in potentially significant air quality impacts to local air quality by generating dust (PM₁₀) emissions during construction activities. “Short term” emissions include on-site and off-site generation of fugitive dust, on-site generation of exhaust emissions from construction equipment, and the off-site generation of mobile source emissions during the construction phase of the proposed project. “Worst case” construction emissions typically occur during initial site preparation, including grading and excavation, due to the increased amount of surface disturbance and the number and type of construction equipment normally required.

The primary sources of construction-related dust include grading, excavation, building roads, and travel on unpaved surfaces. Within the MBUAPCD, construction PM₁₀ emissions impacts on regional air quality are assessed based on the quantity of earth movement that would take place on a given day of construction. Grading in excess of 2.2 acres per day is considered to result in a potential impact. Construction of the Phase One and Phase Two improvements, including reconfiguration of the existing paved parking lot, will disturb a total of about 2.5 acres of the site - about one-half of the 5.13-acre eastern portion of the property. However, because construction of each phase will occur separately, it is unlikely that the site will disturb more than 2.2 acres per day.

The air basin is also in nonattainment for the state standard for ozone. The MBUAPCD has developed criteria pollutant emissions thresholds, which meet or exceed state and federal air quality thresholds. State thresholds are enforced by the California Air Resources Board (CARB) as mandated by the California Clean Air Act. The thresholds are used to determine whether or not the proposed project would violate an air quality standard or contribute to an existing violation.

Operational Impacts: Operational emissions for the proposed project for both Phases of the elementary school project were estimated using the vehicle trip generation estimates provided in the District Plan Traffic Report (Hatch Mott MacDonald, 2009) and URBEMIS2007 Version 9.2.4. The URBEMIS report is included as an appendix to the Greenhouse Gas Emissions Report in Appendix B of this initial study. The Traffic Impact Analysis is presented as Appendix B of the District Plan. As shown in [Table 1, Operational and Area Source Emissions](#), project vehicle and operational emissions do not result in significant impacts with regard to air quality.

Table 1 Operational and Area Source Emissions

Criteria Pollutant	MBUAPCD Threshold	Project Emissions (lbs/day)
ROG	137 lbs/day (direct + indirect)	12
NO _x as NO ₂	137 lbs/day (direct + indirect)	12
PM ₁₀	82 lbs/day (direct)	10.5
SO _x as SO ₂	150 lbs/day (direct)	0.05

Source: URBEMIS2007 version9.2.4, Higgins and Associates 2008.

- d. According to the MBUAPCD CEQA Guidelines, a sensitive receptor is generically defined as a location where human populations, especially children, seniors, and sick persons, are located where there is reasonable expectation of continuous human exposure. These typically include residences, hospitals, and schools. Sensitive receptors in proximity to the project site are residences that adjoin the project site, other adjacent residences in the vicinity, and users of the existing park and community center facilities. Although the effects of construction projects are temporary, and daily grading is not likely to exceed the MBUAPCD’s threshold, heavy construction generates PM₁₀ emissions that would have a substantial impact on local air quality. Several sensitive receptors are located very close to the project site, and could be significantly affected by construction dust. These sensitive receptors could be exposed to increased PM₁₀ and diesel emissions during construction activity on the site. The District Plan includes the following policies and implementing actions to reduce exposure to dust and engine exhaust and ensure compliance with MBUAPCD standard construction dust control measures.

Policy NR-5. Encourage alternatives to automobiles.

Implementation Action NR-5.1. The District will provide bicycle parking on the school grounds.

Implementation Action NR-5.2. The District will provide transportation services for disabled students to the school facility at implementation of Phase Two.

Policy NR-6. Minimize idling engines.

Implementation Action NR-6.1. The District will minimize idling in passenger loading and unloading areas, by posting signage that advises drivers not to idle while waiting to pick up/drop off passengers. The District will also provide written

notice to parents at the beginning of each school year identifying the potential health effects of vehicle emissions and notifying them of the idling restrictions on the site.

Implementation Action NR-7.1. During construction of Phase One and Phase Two improvements, the District will implement control measures to reduce exposure of nearby residences and park users to dust, odors, and diesel equipment emissions, in compliance with MBUAPCD regulations.

Policy NR-7. Minimize construction-related dust and equipment emissions.

Implementation Action NR-6.1. The District will minimize idling in passenger loading and unloading areas, by posting signage that advises drivers not to idle while waiting to pick up/drop off passengers. The District will also provide written notice to parents at the beginning of each school year identifying the potential health effects of vehicle emissions and notifying them of the idling restrictions on the site.

Implementation Action NR-7.1. During construction of Phase One and Phase Two improvements, the District will implement control measures to reduce exposure of nearby residences and park users to dust, odors, and diesel equipment emissions, in compliance with MBUAPCD regulations.

Implementation of these policies and the following mitigation measure would reduce the likelihood of exposure to engine exhaust and substantial PM₁₀ emissions during construction and would reduce the short-term construction impacts to a less than significant level.

Mitigation Measure

AQ-1. To control, to the greatest extent feasible, dust during grading, excavation and construction activities, Soquel Union Elementary School District will include the following MBUAPCD dust control measures into contracts for the proposed project:

- a. Water all active construction areas at least twice daily, or as required to control dust;*
- b. Cover all trucks hauling dirt, sand, or loose material;*
- c. Sweep streets within one day if necessary to remove dirt, sand, or loose material dropped from trucks hauling such material;*
- d. Apply (non-toxic) chemical soil stabilizers on all unpaved access roads, parking areas and staging areas as well as on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);*

- e. *Cover inactive storage piles;*
- f. *Limit traffic/equipment speed on unpaved surfaces to 15 mph, or less under windy conditions; and*
- g. *Plant vegetative ground cover in disturbed areas as soon as possible.*

Diesel engines emit a complex mix of pollutants including NO_x, particulate matter, and TACs. The most visible constituents of diesel exhaust are very small carbon particles or "soot," known as diesel PM. Diesel exhaust also contains over 40 cancer-causing substances, most of which are readily adsorbed on the soot particles. Among the TACs contained in diesel exhaust are dioxin, lead, polycyclic organic matter, and acrolein.

Short-term exposure to diesel PM is associated with variable irritation and inflammatory symptoms. Diesel engine emissions are responsible for a majority of California's estimated cancer risk attributable to air pollution. In 2000, the California Air Resources Board (CARB) identified an average potential cancer risk of 540 excess cases per million people, statewide, from diesel PM. In addition, diesel PM is a significant fraction of California's particulate pollution. Assessments by CARB and U.S. EPA estimate that diesel PM contributes to approximately 3,500 premature respiratory and cardiovascular deaths and thousands of hospital admissions annually in California. Diesel exhaust contains several chemicals detrimental to visibility and vegetation (OEHHA 2001).

Diesel exhaust is especially common during the grading stage of construction (when most of the heavy equipment is used), and adjacent to heavily trafficked roadways where diesel trucks are common. EPA regulates diesel engine design and fuel composition at the federal level, and has implemented a series of measures since 1994 to reduce NO_x and particulate emissions from off-road diesel equipment. EPA Tier 2 diesel engine standards were implemented from 2001 and 2006, Tier 3 standards from 2006-2008, and Tier 4 standards are being phased in through 2014. Ultralow sulfur off-road diesel fuel (15 ppm) will become standard in 2010, replacing the current 500 ppm fuel. The Tier 4 engines and ultralow sulfur fuels will reduce emissions by up to 65 percent compared to older engines and fuel (EPA 2004). CARB's Regulation for In-use Off-road Diesel Vehicles establishes a state program to reduce emissions from older construction equipment. Implementation of this regulation will reduce construction equipment emissions over time.

- e. The proposed project may result in short-term construction-related odors (e.g., asphalt during paving), but is not anticipated to produce offensive odors during operation. The generation of substantial or significant offensive odors over the long term is not typically associated with school uses.

- f. Pursuant to Senate Bill 97, the California Office of Planning and Research and the Natural Resources Agency have been developing guidelines for mitigating environmental effects of climate change. Guidelines, in the form of Adopted Amendments to the CEQA Guidelines, were released by the Natural Resources Agency December 30, 2009. The Adopted Amendments will not become effective until after the Office of Administrative Law completes its review of the Adopted Amendments and rulemaking file, and transmits the Adopted Amendments to the Secretary of State for inclusion in the California Code of Regulations. This is anticipated to happen by March 2010. The City of Capitola and the County of Santa Cruz have yet to adopt thresholds of significance for greenhouse gas (GHG) emissions.

The creation of GHG emissions and resulting climate change is a global phenomenon and the specific contribution of individual single projects is very difficult to quantify. The most common GHG is CO₂, which constitutes approximately 84 percent of all GHG emissions in California. Worldwide, the State of California ranks as the 12th to 16th largest emitter of CO₂ and is responsible for approximately two percent of the world's CO₂ emissions. The California Energy Commission is charged with developing regular inventories of GHG emissions in the state. These inventories are used as a baseline from which statewide efforts to reduce GHG emissions can be measured. The three leading contributors to greenhouse gas emissions in California are on-road transportation (36 percent), electricity generation (23 percent, of which about half is generated out of state); and industry (20 percent) (CEC 2007).

In 2004, total worldwide GHG emissions were estimated to be 20,135 teragrams (Tg) CO₂ equivalent (CO₂e), excluding emissions/removals caused by removal of vegetation and forestry. CO₂e represents "carbon dioxide equivalency". It describes the global warming potential of a greenhouse gas or mixture of greenhouse gases in terms of the amount of CO₂ that would have the same global warming potential. A teragram equals one million metric tons. In 2004, GHG emissions in the U.S. were 7,074.4 Tg CO₂ equivalent. In 2005, total U.S. GHG emissions were 7,260.4 Tg CO₂e, a 16.3 percent increase from 1990 emissions, while U.S. gross domestic product has increased by 55 percent over the same period (EPA 2007).

California, the eighth largest economy in the world, is a substantial contributor of global GHGs. It is the second largest contributor in the United States and the sixteenth largest in the world. Based upon the California Energy Commission's *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004, June 2005 and December 2006*, California produced 492 million metric tons (542,336,520 tons) of CO₂ equivalent in 2004, the latest year that emissions data is available.

An inventory of all GHG emissions in Santa Cruz County has not yet been conducted; however, partial information on such emissions does exist. According to MBUAPCD’s 2004 Santa Cruz County Mobile Source Greenhouse Gas Inventory, the county’s mobile sources generate about 1,125,000 metric tons of CO₂ equivalents per year (page 6).

Each Phase of the proposed elementary school will generate an increase in greenhouse gas emissions (GHG) during construction and operations. A GHG emissions inventory report was prepared by EMC Planning Group Inc to estimate the carbon footprint of the Phase One and Phase Two elementary school improvements. Project GHG emissions were estimated for construction and operational phases of the project using URBEMIS 7G VERSION 9.2.4 modeling software produced by the California Air Resources Board. The report also lists energy conserving and emissions-reducing improvements which can feasibly be achieved by SUESD to offset emissions generated by the new school facility. Off-site emissions related to on-site electricity use was estimated using the California Climate Action Registry General Reporting Protocol (January 2009) and default emissions values for electrical generation. The Greenhouse Gas Report is included as [Appendix B](#)

The project’s contribution of GHG emissions would result from construction (emissions from construction equipment, land disturbance, production of construction materials, transportation of materials, and vehicle trips from construction workers), and from operations (electrical use, transportation of staff and students). A summary of the project GHG emissions from construction, operational, and mobile sources is provided in [Table 2, Phase One and Phase Two CO₂ Equivalent Emissions](#). Construction of each Phase of the elementary school project is assumed to be completed in no more than one year. Operational and vehicle emissions shown in Table 2 would occur annually over the lifetime of the elementary school project. The values shown are metric tons of CO₂ equivalents. One U.S. ton is equal to 0.907 metric tons. One pound is equal to 0.000454 metric tons.

Table 2 Phase One and Phase Two CO₂ Equivalent Emissions (Metric Tons)

Source	Phase One	Phase Two	Operational	Total
Construction	67.35	66.29		133.64
Operational (Energy)			131	131
Operational (Vehicle)			469	469
Total	67.35	66.29	600	733.64

Source: Greenhouse Gas Report Table 4, EMC Planning Group Inc. 2010

Operational and mobile emissions result in the greatest GHG emissions. Combined, the project's operational and mobile source GHG emissions represent about 0.00012 percent of California emissions (600/492 million x 100). The project's GHG emissions from mobile sources would represent about 0.042 percent of Santa Cruz County mobile GHG emissions (469/1,125,000 x 100). Due to its small scale, the proposed project will not result in any cumulatively considerable GHG emissions. Therefore the impact is less than significant and no mitigation is required.

Although the Phase One and Phase Two GHG emissions are not cumulatively considerable, the District Plan includes design and policy provisions to further reduce project-related emissions. The District Plan calls for the use of energy conserving appliances and low emission materials, including photovoltaics if determined to be feasible by SUESD to offset to the extent feasible, the carbon footprint of the school facility. According to the GHG Emissions Report, SUESD intends to generate a portion of its electrical needs through on-site photovoltaic panels (page 6). According to the project architect, at least one-half of the project's electrical demand could be met through on-site solar electricity, which would significantly reduce energy consumption and related emissions (Miles correspondence March 23, 2009).

The proposed elementary school buildings also are intended to meet California High Performance School requirements, which are the equivalent of LEED-Certified silver to gold level buildings. The proposed Phase One and Phase Two improvements include design features such as building orientation and placement to maximize passive solar cooling, heating and lighting; use of light colored roofing materials that reflect heat, or other "cool" roofing materials including high albedo materials; materials that provide air circulation; attic ventilation construction to prevent summer heat from penetrating buildings; and energy efficient lighting including LED and straight tube and compact fluorescents. Additional design features to be implemented if determined to be feasible by SUESD include the following: solar water heating systems; the installation of only Energy-Star rated appliances as feasible; and energy efficient heating and cooling systems with automated control systems. The project's contribution of GHG emissions would result from construction (emissions from construction equipment, land disturbance, production of construction materials, transportation of materials, and vehicle trips from construction workers), and from operations (electrical use, transportation of staff and students).

The District Plan also includes policies and implementing actions that will conserve energy and water use, promote transportation alternatives consistent with SUESD policy, and will reduce vehicle miles travelled by the provision of a preschool within the District. Implementation of mitigation measures AQ-1 and AQ-2, the District Plan

policies and implementation actions cited above (item d), and the following District Plan policies and implementation actions will further reduce operational and mobile source GHG emissions:

Policy C-3. Maintain pedestrian and bicycle access across the site that is equal to or greater than current levels.

Implementation Action C-1.3 The District will provide marked crosswalks and signage in the central parking lot as illustrated in Figures 7 and 8 of the Plan.

Implementation Action C-3.1. The District will maintain a continuous pedestrian pathway adjacent to 47th Avenue between the north and south property lines of the District property.

Implementation Action C-3.2. At implementation of Phase Two, the District will promote walking buddy and walking school bus programs.

Implementation Action C-3.3. The District will prepare a School Route Plan Map per the guidance contained in the CalTrans Traffic Manual to coordinate the design and placement of pedestrian facilities on area streets.

Policy C-4. Encourage alternatives to automobiles.

Implementation Action C-4.1. The District will provide bicycle parking on the school grounds, consistent with the Division of the State Architects Standards for the design of school facilities.

Implementation Action C-4.2. The District will refer parents to the County Transportation Commission carpool programs.

Implementation Action C-7.3. The District will work with Caltrans and other agencies, as appropriate, to apply for Safe Routes to School funding to remedy impediments to walking and bicycling within the Opal Cliffs site attendance boundaries.

Policy PA-1. Provide public access to the site as illustrated on the Access Plan.

Policy PA-2. Preserve pedestrian access opportunities for future trail connections to and from the Union Pacific Railroad right-of-way where determined to be feasible and safe by the District.

Implementation Action PA-1.1. The District will implement public access as illustrated on the Access Plans for each phase in a manner that does not compromise student safety.

Implementation Action PA-2.1. The District will cooperate with the Santa Cruz County Regional Transportation Commission and the City of Capitola to preserve public access opportunities related to the potential conversion of the Union Pacific Railroad right-of-way to a public trail.

Policy PF-6 Promote recycling and minimize disposal in landfills.

Implementation Action PF-6.1 The District will continue to participate in the Santa Cruz County Office of Education Public School Resource Program to the extent that program remains available to the District.

Implementation Action PF-6.2 The District will specify in construction bids that waste material is to be recycled, and to the extent feasible, recycled or similar sustainable building materials shall be utilized.

Policy PF-7 Minimize vehicle miles traveled.

Policy PF-8 Facilitate conservation of electricity.

Implementation Action PF-7.1 The District will provide pre-school programs for children within the District boundary to reduce vehicle trips to other school districts.

Implementation Action PF-8.1 As part of design and construction of Phase One and Phase Two improvements the District shall comply with applicable Title 24 energy conservation requirements for public uses.

Implementation Action PF-8.2 The District will provide windows and/or skylights for natural day lighting of buildings and utilize high efficiency artificial lighting.

Implementation Action PF-8.3 The District will utilize Energy Star rated appliances to the extent feasible.

Implementation Action PF-8.4 The District will utilize photovoltaic electrical generation to the extent feasible. Photovoltaic arrays may be freestanding or incorporated into building design, but in no case shall be placed within setbacks or exceed height restrictions as prescribed by this PWP.

4. BIOLOGICAL RESOURCES

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
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, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service? (2,3,14,29)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service? (2,3,14,24,29)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands, as defined by section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means? (2,3,14,29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
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, or impede the use of native wildlife nursery sites? (2,3,14,29)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (2,3,4,13,29)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a-d. A biological survey of the SUESD property was conducted by WRA Environmental Consultants on December 31, 2007 to identify conditions on the site and the potential for biological resources. The results of the survey are presented in the biological resources assessment report which is presented as Appendix D in the District Plan. Observations made during the 2007 biological survey confirm that the site does not contain nor is it located in or near environmentally sensitive habitat areas or sensitive biological communities. The 2007 WRA biological resources report evaluated the habitat value of the site referencing the Santa Cruz County LCP. To verify conditions at the site and to confirm that the conclusions drawn in the report do not conflict with the City of Capitola LCP, EMC Planning Group conducted a site visit on May 14, 2008.

As shown in Figure 3, Aerial Photograph, the project site is relatively flat and landscaped with turf, ornamental shrub and tree species, and a community garden. Vegetation at the southern boundary of the site near the Union Pacific Railroad line is reverting to a semi-ruderal state with weedy species. Several coast redwood (*Sequoia sempervirens*) and liquidambar (*Liquidambar styraciflua*) trees are located on the site. The biological resources report concludes that while the redwood trees are an appropriate species for the coastal location, they are not native to the site and were most likely nursery-grown for ornamental landscaping uses. Wildlife species observed during the site visit were noted as those commonly found in urban or developed areas. No significant native resident or migratory wildlife corridors or native wildlife nursery sites were identified during the surveys.

Wetlands and Waters of the U.S. No aquatic habitat or potentially jurisdictional wetland and waters of the U.S. were identified at the site.

Protected Habitat/Plant Communities. The Coastal Act defines an Environmentally Sensitive Habitat Area (ESHA) as any area in which plant or animal life or their habitat are either rare or biologically valuable because of their role in an ecosystem, and which could easily be disturbed by human activity and development. Significant natural resource areas present within the City of Capitola are identified in the City's 1989 LCP/General Plan, and consist of the Monterey Bay and beach areas, Soquel Creek and Lagoon, Rodeo Gulch, Soquel Creek Riparian Corridor, Noble Gulch Riparian Corridor, Tannery Creek Riparian Corridor, and the Soquel Creek/Escalona Gulch Monarch Butterfly Grove. The site is not located in designated ESHA. However, the site is located in the vicinity of two identified natural resource areas: Soquel Creek drainage to the east, and Rodeo Creek drainage to the west.

Construction of each phase of the SUESD Elementary School Project would increase the amount of impervious surfaces on the site which would increase the amount of storm water runoff capable of affecting down stream areas. Drainage from the central parking lot and soccer field already drain to existing catch basins. The catch basins in the central parking lot will be replaced. The catch basins for the soccer field are located at the southern end of the property near the railroad tracks, and would remain unaffected by either Phase One or Phase Two improvements. Drainage improvements are intended to limit post-development runoff to pre-project levels. Also, construction activities associated with the school facility improvements have the potential to affect water quality in these sensitive downstream areas. Impacts to aquatic resources within the vicinity of the project site are considered potentially significant. The Plan includes the following two implementation measures designed to protect aquatic resources in the vicinity of the project site:

Implementation Action NR-3.1. As a part of construction of Phase One and Phase Two improvements, the District will design and implement renovation of the central parking lot, other paved areas, and building roofs to drain into landscaped infiltration areas to the greatest extent feasible. Storm water that is not directed to landscaped infiltration areas shall be directed to storm drain improvements, such as energy dissipators, and grease and sediment traps, in compliance with Santa Cruz County Sanitation District and Soquel Creek Water District standards. All storm drain improvements shall be designed to contain storm water runoff to pre-project levels.

Implementation Action NR-4.1. Where feasible, design recreational areas, particularly playfields, to drain to low-use areas for infiltration, and encourage non-chemical maintenance of turf and landscaping for Phase One and Phase Two.

Upon implementation of these measures, potential impacts to aquatic resources in the project vicinity are considered less than significant. No mitigation measures are necessary.

Special Status Species. Although 39 special status species are known to occur in the vicinity of the project area, no wildlife species of special concern were observed during the site visit. The biological resources report concluded that the SUESD property has low potential for providing suitable habitat for special status plant and animal species.

The trees on the site have habitat value for a variety of nesting/breeding birds, protected under the Migratory Bird Treaty Act, which prohibits the disturbance of breeding birds and their eggs or chicks. One abandoned nest was observed during the 2007 site survey. Impacts to nesting or breeding birds at project site are considered potentially significant.

The District Plan includes the following two implementation measures designed to protect nesting/breeding birds at the project site:

Implementation Action NR-2.1. Prior to site preparation activities and construction of Phase One and Phase Two improvements that commence during the active breeding and nesting season (between February and August), the District will hire a qualified biologist to conduct nesting bird surveys in accordance with Fish and Game and/or Fish and Wildlife protocols.

Implementation Action NR-2.2. No tree may be removed from the site during the active breeding season, if active nests are present within 300 feet of that tree.

Upon implementation of these measures, potential impacts to nesting/breeding migratory birds are considered less than significant. No mitigation measures are necessary.

- e. **Protected Trees.** Modifications to trees and their canopy in the City of Capitola are typically subject to compliance with the provisions of the City's tree ordinance (Capitola Municipal Code Chapter 12, Community Tree and Forest Management). The City's LCP Policy 8, requires consistency with the City of Capitola tree ordinance.

Tree removal and replacement is governed by Article IV of the ordinance and requires removed trees to be replaced at a minimum ratio of two to one on the site, with the overall goal of maintaining a 15 percent tree cover on any site. The ordinance contains additional provision for the payment of in-lieu fees if on-site replacement plantings are not feasible (Capitola Municipal Code Section 12.12.190 A-C).

The removal of several trees is necessary to accommodate the construction of Phase One and Phase Two improvements on the site. SUESD has included tree replacement provisions consistent with the City's tree ordinance in the District Plan to compensate for the removal of trees that may be necessary for the construction of Phase One and Phase Two.

The removal of additional trees may be necessary in the future to remove dead or diseased trees that pose hazards to the users of the school grounds and park. Development of the project site and future maintenance activities would include landscaping and the periodic replacement of existing ornamental species as they reach the end of their natural lifespan. Tree removal from the site without compensatory measures to preserve the tree canopy, would be considered a potentially significant impact. The District Plan includes the following two implementation measures consistent with the City's tree ordinance, to compensate for trees removed as a result of the Phase One and Phase Two improvements:

Implementation Action NR-1.1. The District will locate Phase One and Phase Two improvements to minimize the loss of mature trees, particularly those trees along the periphery of the site near residences.

Implementation Action NR-1.2. Any tree greater than six inches in diameter at a point 48 inches from the ground that is removed from the site, shall be replaced on the site at a 2:1 ratio, if feasible. If not feasible, the District will contribute to the City's community tree fund to pay for tree replacement planting in suitable locations in other city parks, sensitive habitat areas, or along city streets.

The Plan originally called for the removal of three trees to accommodate the Phase One and Phase Two improvements. Since the District Plan was prepared, the City removed two of the trees that were proposed for removal by the Plan and planted six replacement trees within the proposed footprint of the Phase Two improvements. The replacement trees will need to be either removed or relocated elsewhere on the site to accommodate the proposed Phase Two improvements. The District will add the following policy language to the Plan to more clearly define responsibility for tree removal and replacement on the site.

No tree shall be removed from or replaced on the site without first consulting with the property owner regarding the number, locations, and size of tree(s) proposed for removal and the locations of required replacement plantings.

Upon implementation of these measures, the impact to the trees and their canopy the loss of trees at the project site is considered less than significant. No mitigation measures are necessary.

- f. No Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans include the proposed project site. No impacts to a plan are expected.

5. CULTURAL RESOURCES

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5? (2,3,18,26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5? (2,3,18,26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries? (2,3,18,26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

a-d. A cultural evaluation of the site including a field visit, archival research and a sacred lands check, was conducted by Historic Resource Associates in November, 2007 for the Opal Cliffs Pre-school and Elementary School project. The report is presented as Appendix E in the District Plan. The report concludes that no historic or prehistoric resources are present on the site and the proposed project would not result in impacts to unique paleontological or geologic features on the site. Archival research revealed that no previous studies of the project site had been conducted. On November 8, 2007, the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) conducted a record search (07-660) of the proposed project area. Review of data maps, historic-period maps, and literature for Santa Cruz County indicated that the project area contained no recorded Native American or historic-period resources. The literature review indicated that sidings and buildings associated with the Southern Pacific Railroad were present adjacent to the site circa 1914, but these no longer exist. A record search conducted on November 30, 2007 by the Native American Heritage Commission (NAHC) concluded that there is no evidence of the presence of Native American cultural resources in the project area.

During a field inspection of the entire site, no significant paleontological, prehistoric or historic archaeological sites, features, surface indicators, or artifacts were found, and no significant historic buildings, structures, or objects were observed. Based upon the

archival research and field observations documented in the report prepared by Historic Resource Associates, the site is not located within a known archaeological site, and no unique paleontological or prehistoric or historic resources are known to be present on the site.

The report concludes that it is unlikely that significant archaeological and/or paleontological features may be present on the site. The proposed Opal Cliffs Elementary School improvements include excavation to construct footings, foundations, and trenching for utilities, and because previously undiscovered subsurface prehistoric features could be disrupted by earth-disturbing activities, the District Plan includes provisions consistent with City of Capitola LCP to protect and minimize disruption to these features should they be inadvertently discovered during excavation on the site.

Policy CR-1. Take steps to protect unknown cultural resources if discovered.

Implementation Action CR-1.1. The District shall be responsible for the appropriate dispensation of previously undiscovered archaeological resources if encountered during construction. Should archaeological resources be discovered at the project site during any phase of construction, the Permittee shall stop work until a mitigation plan, prepared by a qualified professional archaeologist in coordination with interested Native Americans, is completed and implemented. Prior to implementation, the mitigation plan shall be submitted for review and approval by the State Historic Preservation Office. The plan shall provide for reasonable mitigation of the archaeological impacts resulting from the development of the site, and shall be fully implemented.

Implementation Action CR-1.2. The District will ensure that this language is included in all construction documents in accordance with CEQA Guidelines section 15064.5(e), in the event of an accidental discovery or recognition of any human remains in any location other than a dedicated cemetery: "If human remains are found during construction there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of Santa Cruz County is contacted to determine that no investigation of the cause of death is required. If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the Soquel Union Elementary School District or the person responsible for the excavation work, for means of treating or disposing of, with

appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code Section 5097.98. The Soquel Union Elementary School District or its authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if: a) the Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 24 hours after being notified by the commission; b) the descendent identified fails to make a recommendation; or c) the Soquel Union Elementary School District or its authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.”

Implementation of the District Plan policies and implementing actions would reduce this impact to less than significant. No mitigation is necessary.

6. GEOLOGY AND SOILS

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) 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? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
(2) Strong seismic ground shaking? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
(4) Landslides? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
b. Result in substantial soil erosion or the loss of topsoil? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. 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? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (2,3,14,21)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a-c. The City of Capitola General Plan notes that there are no active faults within the City of Capitola; however, several faults are located nearby in the Santa Cruz Mountains and in the Monterey Bay. According to the general plan, about half of the City, including the District Plan area, is located within an area of high seismic shaking hazards. The primary geological hazards affecting the City are associated with exposure of persons and property to seismic events. Primary seismic hazards are ground shaking and surface rupture along earthquake faults and secondary hazards result from the interaction of ground shaking with soil and bedrock conditions. Secondary hazards include liquefaction, subsidence, landslides, tsunamis or seiches. The City's general plan requires the preparation of geologic/engineering report for development of buildings for public uses in this area. A preliminary geotechnical report was prepared for the Opal Cliffs Elementary School Project by Pacific Geotechnical Consultants in October of 2007. The report is presented as Appendix C of the District Plan.

According to the report, the project site is located in an area that is identified on the Santa Cruz County liquefaction potential map as having a low liquefaction potential, and the report also concludes that the potential for lateral spreading is also low on the site. The report notes that no groundwater is located beneath the site and therefore, the potential for subsidence is very low. The geotechnical investigation determined that the site is not located within an Alquist-Priolo Earthquake fault zone, and the site is also not within any local fault zones mapped by the County of Santa Cruz. The closest fault to the project site is the Monterey Bay-Tularcitos fault located in the Monterey Bay about nine miles from the site. Available records reveal that historic earthquakes that have caused damage in the vicinity of the site have occurred along the San Andreas, Calaveras, and Hayward faults. Based upon soil borings and a probabilistic seismic hazard model, the report concludes that the potential for ground shaking at the site is high. The project site is not subject to unstable soils, erosion, or landslide hazards because the site is relatively flat and is located atop a marine terrace, about 800 feet from the nearest coastal bluff edge. A residential neighborhood lies between the site and the bluff. The District Plan includes the following policy provisions to reduce exposure to seismic events.

Policy HZ-2. The District will construct buildings in accordance with current state standards.

Implementation Action HZ-2.1. The District will conduct appropriate soil and/or geotechnical investigations, as necessary for structural design recommendations prior to the preparation of design and construction drawings, for school facilities and obtain the approval of the State Architect for all buildings.

Compliance with the District Plan policy and implementation action would reduce the risk of exposure to seismic hazards to less than significant. No mitigation is required.

- d. According to the geotechnical report, on-site soils are consolidated marine terrace deposits and gravel, which were confirmed by test borings on the site. The report notes that, due to the low potential for liquefaction, there is also a low potential for expansive soils. The District Plan Policy HZ-2 and Implementation Action HZ-2.1 (described in item c, above) require compliance with current state standards for building construction and also require additional soil and/or geotechnical investigations, as necessary for structural design recommendations prior to the preparation of design and construction drawings for school facilities. Compliance with this policy would reduce the impact to less than significant. No mitigation is required.
- e. No septic tanks are proposed. The existing Community Center and restroom buildings are connected to the municipal sewer main. The proposed buildings will also connect to the existing sanitary sewer system. No mitigation is required.

7. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (2,3,13,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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? (14,22)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
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, create a significant hazard to the public or the environment? (13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
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 a public-use airport, result in a safety hazard for people residing or working in the project area? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands area adjacent to urbanized areas or where residences are intermixed with wildlands? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a,b. The proposed project does not include the manufacture or transport of hazardous materials. The City's Hazardous Materials Ordinance regulates the transport, storage and use of hazardous materials. In the event of spills, the city cooperates with Santa Cruz County and the Central Fire District of Santa Cruz to respond to hazardous materials spills. The proposed project does not allow the use, transport or storage of hazardous materials other than those typically associated with construction and routine operations of elementary school and recreational programs.

A Phase One Environmental Site Assessment (ESA) was conducted on the site by Diablo Green Consulting in September 2007. The ESA is presented as Appendix G of the District Plan. According to the ESA, there is a potential for the presence of lead in soils and residual pesticides/herbicides that may occur on the project site associated with the age of the surrounding neighborhood and horticultural activities in the community garden, respectively. Construction of the Phase One and Phase Two school facilities could expose children, employees and park users to soils containing residual lead and pesticides concentrations, which would be considered a significant impact.

The ESA includes recommendations to reduce the hazards associated with exposure to lead and residual pesticides which include testing and abatement if necessary. According to the District Plan, the City of Capitola will be conducting appropriate testing and abatement of residual pesticides in the community garden area (page 7-7). Consistent with the recommendations of the ESA, the District Plan includes the following implementing action to reduce exposure and appropriately dispose of contaminated soils.

Implementation Action HZ-1.1. The District will undertake soil testing to determine if unacceptable levels of lead are present. The testing and any necessary corrective action will be conducted pursuant to state requirements for the treatment of hazardous materials.

The District Plan also includes policy guidance for the appropriate use of chemicals in landscaping activities on the site.

Implementation Action HZ-1.5. The District will control herbicide and pesticide use on the entire site as required by law.

Implementation of these actions would reduce risks of exposure to hazardous chemicals the impact to less than significant. No additional mitigation or policy is required.

- c. The project site adjoins an active branch of the Union Pacific Railroad and a Railroad Risk Analysis report was prepared by Rail Technology, Inc., in December 2007. This report is presented as Appendix F of the District Plan. The report assesses the risks associated with placement of a school facility in proximity to the active Union Pacific Railroad freight line. The report concludes that the project would not increase the risks of accidents involving hazardous materials from the freight activity on the nearby Union Pacific Railroad tracks. According to the report, rail cars containing hazardous materials are not routinely carried on this line. The report notes that hazardous materials shipped in railcars are subject to the strict requirements of the Hazardous Materials Transportation Act and railcars intended for that use are designed with very high crash worthiness standards. The report concludes that the risk of a derailment that would expose people or property to hazardous materials is very low due to the infrequency of transport, low maximum speed of trains on this line, proximity of local emergency responders to the school site, and high visibility along the tracks near the park. The District Plan includes the following implementation actions to further reduce risks associated with the rail line. No further mitigation is required.

Implementing Action HZ-1.2. The District will communicate the school opening and annual operations with Union Pacific Railroad to make them aware of additional children on the site.

Implementing Action HZ-1.3. As a part of implementation of the Phase One improvements, the District will provide and maintain fencing around the perimeter of the school grounds.

Implementing Action HZ-1.4. At implementation of Phase Two, the District will provide a fence (with protected openings to provide pedestrian access) around the perimeter of the school grounds. To promote the safety of school children, pedestrian openings shall not be placed along the southern perimeter.

- d. According to the ESA, the site is not located on any list of hazardous materials site.
- e,f. The project site is not located within an airport land use plan or in the vicinity of a private airstrip.
- g,h. The project site is located within the Central Fire District service area and is accessible from public streets. The site, located within an established urban area of the City, is not located in or adjacent to wildlands. The proposed project would not impair the provision of emergency service or access on the site or in the vicinity of the site. The following policies within the District Plan provide a safe environment on the site with adequate emergency access.

PF-5.1 At implementation of each school Phase, the District will include the site in the District Safety Plan prior to submission of plans to the Division of the State Architect.

PF-5.2 The District will identify locations of emergency vehicle and pedestrian access/egress routes to and from school grounds, locations of on-site emergency equipment, procedures during an emergency within school buildings, and provide emergency ingress information and keys/codes to the Capitola Police Department and Capitola Fire Department to assist with emergency response and comply with City of Capitola police and fire service safety provisions and standards.

8. HYDROLOGY AND WATER QUALITY

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Violate any water quality standards or waste discharge requirements? (2,3,6,10,14,21,24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., would the production rate of preexisting nearby wells drop to a level which would not support existing land uses or planned uses for which permits have been granted? (14,25,26,33)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? (14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface run-off in a manner which would result in flooding on- or off-site? (5,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
e. Create or contribute run-off water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted run-off? (2,3,5,12,14,25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
f. Otherwise substantially degrade water quality? (2,3,12,25)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (2,3,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (2,3,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? (12,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
j. Cause inundation by seiche, tsunami, or mudflow? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

a,f. Storm water in this area of the City of Capitola is collected in gutters and storm drains and conveyed in underground pipes which discharge into the Monterey Bay at the Opal Cliff Drive outfall. The County and City coordinate implementation of the joint *Santa Cruz County/City of Capitola 2003 Storm Water Management Plan* (SWMP). The County and City are in the process of updating the SWMP, which requires the use of Best Management Practices to control the introduction of sediments and urban pollutants into the watershed and ultimately to the Monterey Bay.

Implementation of each phase of the Public Works Plan Elementary School Project would increase the amount of impervious surfaces on the site which would increase the amount and quality of storm water runoff capable of affecting down stream areas. Construction activities associated with the school facility improvements have the potential to affect water quality in sensitive downstream areas. As discussed in Section 3, Biological Resources, the District Plan requires conformance with City and County standard mitigations and conditions of approval that would substantially lessen or avoid potential impacts to water quality from construction-related activities and increases in impervious surfaces on the site resulting from each construction phase of the proposed elementary school.

Implementing Action NR-3.1 requires a no net increase in stormwater flow from predevelopment levels and also requires the installation of energy dissipators, sediment traps and grease interceptors in storm drains. Implementing Action 4.1 encourages infiltration and design features such as bioswales and pretreatment if necessary prior to discharge into the municipal storm drain system. The District Plan includes additional policies to reduce construction-related impacts to public stormwater facilities.

PF-2.1 At implementation of Phase One improvements, the District will renovate the existing central parking lot and design new paved areas and building roofs to drain into landscaped infiltration areas, to the extent feasible.

PF-2.2 Prior to the implementation of Phase One and Phase Two improvements, the District will design storm drain improvements pursuant to the requirements and design standards of the joint County/City Storm Water Management Plan, and consistent with the Preliminary Landscape Plans as depicted in Figures 11 and 12, Phase One and Phase Two Landscaping Plans.

All drainage improvements on the site would be subject to compliance with the Joint SWMP. Additionally, turf fields and landscaped areas on the site will be maintained consistent with existing SUESD practices, which include limited application of chemicals. Implementation of District Plan policies and implementation actions would reduce impacts to water quality to less than significant. No mitigation is required.

- b. Water service to the site is provided by the Soquel Creek Water District (SqCWD). According to the SqCWD Urban Water Management Plan 2005 Update (Available online at <http://www.soquelcreekwater.com>), groundwater aquifers are in a state of overdraft and the SqCWD has adopted several programs including conservation and a Water Demand Offset Program to reduce or limit pumping to 4,800 acre feet annually while developing a supplemental supply. The project site is located within the service area of the SqCWD and is currently connected to the municipal distribution system. Existing water demanding uses on the site include the community center, public restrooms, the community garden, irrigated playfields and ornamental landscaping. Existing eight-inch water mains are located on Jade Street and Topaz Street to the north and 47th Avenue to the east of the project site. An eight-inch water main provides water to the site. All proposed connection improvements would be designed and constructed to SqCWD standards.

A preliminary water audit prepared by WM Architects (2008) estimates that the community garden consumes an average of about 2.5 acre-feet per year (AFY). As summarized in the District Plan, Table 1, Existing and Proposed Water Demand, the audit anticipates that the Phase One preschool improvements will require 0.34 acre-AFY, and the Phase Two improvements would require 1.18 AFY, which combined, is less than the water consumed by the community garden. Therefore, since the proposed school improvements would replace the community garden, the project would not increase water demand for the site. Nevertheless, SUESD petitioned the SqCWD for, and received, a Will Serve letter, which was granted based upon compliance with the water district's conservation programs. Phase One and Phase Two improvements would be subject to compliance with the SqCWD conservation and water demand offset

program requirements. Therefore, the proposed project would not increase the rate of groundwater extraction and would not contribute to overdraft conditions.

The project includes water-saving fixtures in all buildings, utilizing drought-tolerant landscape plantings and providing low-flow irrigation for all landscaped areas within the school grounds that are intended to reduce water use from existing levels by 25 percent. All water conserving programs and design features would be designed and constructed to meet SqCWD design standards and performance thresholds. The District Plan includes the following implementing actions to reduce water consumption on the site.

PF-3.1 To conserve water, the District will design Phase One and Phase Two landscape plans to avoid unnecessary turf, utilize the most drought resistant turf varieties, and set irrigation for early morning hours to minimize evaporation.

PF-3.2 The District will install water conserving fixtures in all new school facilities pursuant to Soquel Creek Water District Standards.

PF-4.1 The District will specify low water use plantings in Phase One and Phase Two landscape areas, and to the extent feasible, eliminate irrigation of these areas.

No mitigation is required.

- c-e. The project site is relatively flat and existing drainage is provided by a series of storm drains, curb and gutter. According to the preliminary geotechnical report, drainage on and in the immediate vicinity of the site flows generally northeast to Soquel Creek. The eastern portion of the site drains toward the southeast. No bodies of water or wetlands are present on the site. Drainage from the central parking lot and soccer field already drain to existing catch basins, and the municipal storm drain system. The catch basins in the central parking lot will be replaced as part of the Phase One improvements. The catch basins for the soccer field are located at the southern end of the property near the railroad tracks, and would continue to provide drainage to the soccer field, and be unaffected by either Phase One or Phase Two improvements.

The District Plan includes provisions to limit post-development runoff volume to no greater than existing levels and prevent impacts to water quality. Policy PF-2 requires sustainable storm drainage control practices. Implementation actions PF-2.1 and PF-2.2 require new paved areas and rooftops to drain into landscaped infiltration areas, and require storm drain improvements to meet performance and design standards of the joint County/City SWMP. Implementation of these policies would reduce the potential impact of an increase in storm water runoff to less than significant. No mitigation is required.

- g-j. The project site is not located within a flood plain or in an area of the City that is subject to tsunami or risks of seiche. The project site is not located within the 100 year flood or tsunami zones identified in the City's General Plan, nor is the site located in an area subject to landslides or mud flows.

9. LAND USE AND PLANNING

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Physically divide an established community? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land-use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

- a. The project site is located in an established urban setting and is zoned for public facilities including park and school uses.
- b. The proposed project site is located in the City of Capitola Coastal Zone and the proposed District Plan and proposed school use are consistent with the City of Capitola Local Coastal Program (LCP). The District Plan includes a consistency analysis which determined that the project is consistent with the policies and provisions of the City of Capitola LCP. The consistency analysis is presented as Appendix I in the District Plan. District Plan policies and implementing actions for the site are as follows.

Policy LU-1. Implement the coastal land use and zoning designations on the site as they exist in the Capitola Coastal Land Use Plan, Coastal Zone Overlay and underlying Public Facilities zone district. The 5.13-acre eastern portion of the Plan area is designated on the City’s Land Use Map as Community Facility – School (SC) and the 4.66-acre western portion of the site is designated Parks and Open Space (P). The basic underlying zoning for the entire site is "PF" Public Facilities District, with "CZ" Coastal Zone Combining District overlays of "P" for Parks and Open Space for the approximately 4.66-acre western portion of the site and "S" for School for the approximately 5.13-acre eastern portion of the site. These designations currently provide consistency for the new uses proposed by this plan.

Policy LU-2. Add elementary school facilities and related improvements in two phases, at the discretion of the Soquel Union Elementary School District Board, as shown in Figures 7 and 8 of the Public Works Plan, while permitting the City, at least during the remainder of the original term of the expired lease, to continue to use the portions of the site not in use by the School District, including those portions of the site currently occupied by the community center, public restrooms, existing playground, baseball diamond, and tennis courts, to the extent consistent with the District's use of the site.

Implementation Action LU-1.1. To the extent consistent with the District's use of the site, the District will permit the City, at least during the remainder of the original term of the expired lease, to continue to use the portions of the site not in use by the District, and implement, at the discretion of the Soquel Union Elementary School District Board, the proposed elementary school and related improvements on the eastern portion of the site as described herein. The District finds that this Public Works Plan implements the existing land use and zoning designations for the site as described in the Capitola Coastal Land Use Plan, the underlying PF Public Facilities District and CZ Coastal Zone Combining District.

Implementation Action LU-2.1. The District will allow the continued use of existing recreational facilities and activities on the entire site during the remainder of the original term of the expired lease, until such time that, at the discretion of the Soquel Union Elementary School District Board, the Phase One Elementary School improvements, as described in this plan, are commenced.

- c. The project site is not located within or adjacent to a habitat conservation plan area or a natural community conservation plan area.

10. MINERAL RESOURCES

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments:

a,b. The project site does not contain mineral resources.

11. NOISE

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies? (2,3,8,9,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive ground-borne vibration or ground borne noise levels? (2,3,8,9,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (2,3,8,9,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (2,3,8,9,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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, expose people residing or working in the project area to excessive noise levels? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
f. For a project located within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels? (2,3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a. The City of Capitola LCP does not identify acceptable levels of noise exposure or provide noise thresholds, nor does the City have adopted performance criteria or noise level standards for new sources of noise. However, some information is available in the City’s General Plan, which identifies the most significant source of noise in the City of Capitola as traffic-related, with the greatest noise levels occurring near State Route 1. Areas adjacent to major arterial routes such as 41st Avenue would also be exposed to

increased levels of traffic-related noise. The City's General Plan Noise Element identifies normally acceptable levels of noise exposures for existing and proposed uses in the vicinity of the site range from 60dB, for residential uses and 70dB for schools, outdoor playgrounds and neighborhood park uses.

The project site is located in a residential neighborhood and is surrounded by residential uses which generally are not exposed to substantial traffic-related noise. The general plan diagram, Future Transportation Sound Levels 2005, indicates that, although the site is located within the 60dB noise contour, it is developed with park and recreational uses that typically generate noises in the 60dB-70dB range. Two acoustical studies were prepared for the site and proposed improvements by Charles M. Salter and Associates on October 3, 2007, and November 13, 2008. The two studies are presented as Appendix H in the District Plan. The acoustical studies identify objective criteria for the perception of change in noise levels in increments of one dB, three dB and five dB. According to the acoustical study, increases in ambient noise of 5dB or more would be noticeable and have the potential to prompt a negative response from residents exposed to the change. This would be considered a significant impact.

The site is developed with park and recreation uses. The southern boundary of the site is bordered by an active branch line of the Union Pacific Railroad, although service on the tracks is infrequent. The project places the school improvements on the opposite side of the site to minimize exposure of school children to hazards and noise associated with the train. Placement of a school use on the site would generate an increase in the ambient noise levels due to an increase in project related traffic, mechanical equipment noise and child noise during outdoor activities. The acoustical studies identify the residences between the proposed school grounds and Topaz Street as the most sensitive receptors to an increase in noise generated by the project.

Existing Noise Levels. In the vicinity of the site, traffic-related noise from vehicles travelling on 47th Avenue is expected to be the most substantial source of noise in the neighborhood. According to the acoustical analysis, existing noise levels on the site were determined to be less than 60dB in most locations, but were measured at 63dB at the northeast corner of the site adjacent to 47th Avenue (Salter and Associates 2008). Additionally, during train pass-by on the nearby tracks, sound levels spiked to 73dB near the existing community garden when the train horns were used (Salter and Associates 2007). Exposure to noise generated by the train is intermittent and short term. Current train operations consist of two trips per day, Monday, Wednesday, and Friday, and occur during daylight hours.

Noise Generation. The Phase One and Phase Two school improvements would increase the frequency of noise-generating activity on the site, from that generated by intermittent use of the soccer field and park facilities, to that associated with daily outdoor school activities. The three sources for project-related increases in noise levels are traffic, mechanical equipment such as heating and cooling units, and child noise. Phase One and Phase Two improvements traffic noise were estimated using peak hour trip generation estimates provided in the traffic study (Hatch Mott MacDonald 2009) prepared for the proposed improvements. Child noise would be expected during outdoor recess activities.

Traffic Noise. The anticipated increase in noise levels for Phase One and Phase Two improvements are presented in Table 3 of the 2008 acoustical study (p 4). As depicted in the table, most of the study locations would not experience a substantial increase in noise levels due to traffic. During Phase One, traffic noise would increase by 3dB near the entrance of the site south of the intersection of 45th Avenue and Jade Street. At Phase Two, the noise level at this location would increase an additional 5dB, which would be considered a significant impact. The study recommends noise attenuation measures such as a sound barrier between adjacent residences on Topaz Street and the school parking lot entrance to reduce traffic related noise increases to less than 5dB for the Phase Two improvements.

Mechanical Equipment Noise. The acoustical study estimates that mechanical noise associated with the Phase One and Phase Two uses, would result in an increase of only 2dB over the lifetime of the project. Noise generated by these sources is not likely to impact nearby residences.

Child Noise. At implementation of both phases, child noise would be the dominant noise source on the site during outdoor play. According to the 2008 acoustical study, most of the site would not experience a substantial increase in ambient noise levels; however, increases of 5dB or more would occur at the property line between the Topaz Street residences and the adjoining preschool playground area. During the Phase One operations, these residences may experience periodic and brief increases in ambient noise levels of 10dB, during the morning and noon recess periods when school is in session. The study recommends the installation of a sound barrier, such as solid fencing, along the north property line to reduce the increase in noise by 6dB to less than 5dB.

Cumulative Noise Level Increases. Combined, project related traffic, mechanical and child noise on the site would cause an unacceptable increase in ambient noise near the entrance of the school parking lot and for the residences between Topaz Street and the school grounds. The studies recommend installation of a sound wall or solid fencing of a

minimum six feet in height along the north property line to attenuate the cumulative noise increase to less than 5dB, combined with properly shielded mechanical equipment. Also, at the implementation of Phase Two, the study recommends relocating preschool play structures out of the line of sight of the residences.

The District Plan includes the following implementation actions to reduce exposure to unacceptable levels of noise.

Implementation Action HZ-3.1. Prior to occupancy of the Phase One school buildings, the District will construct and maintain a six-foot solid fence on the property line between the residences on Topaz Street and playground equipment/areas in order to reduce child-generated noise to adjacent residences.

Implementation Action HZ-3.2. The District will not place playground equipment/areas within the 20-foot landscaped buffer zone along the north property line of the school grounds in order to reduce noise to adjacent residences.

Implementation Action HZ-3.3. Exterior mounted mechanical equipment shall be properly shielded or placed out of the line of sight from the residences on Topaz Street.

Implementation Action HZ-3.4. The District will construct and maintain a solid fence no less than six feet in height on the property line between the residences on Topaz Street and the school entrance/central parking lot to reduce noise associated with school traffic to the adjacent residences.

Implementation of these policies would reduce the noise impact to a less than significant level. No mitigation measures are required.

Noise Exposure. Placement of a school in proximity to an active railroad line could routinely but briefly expose schoolchildren to unacceptable levels of noise associated with passing trains. The use of the tracks is infrequent and the acoustical studies prepared for the project did not identify substantial effects to the exterior areas of the site. The studies recommend that installation of insulated windows and exterior doors would effectively mitigate sound levels to meet the SUESD building interior thresholds for noise. SUESD requires a 45dB threshold for interior noise and a maximum 70dB for exterior noise. The District Plan includes the following implementation actions to reduce the impact.

Implementation Action HZ-3.5. The District will design the site plan for the school to place classrooms at the northern end of the site, away from the railroad tracks.

Implementation Action HZ-3.6. Construction of Phase One and Phase Two improvements shall include wall insulation with a minimum Standard Transmission Class (STC) rating of 45, and minimum STC rating of 28 for doors and window assemblies, and a minimum STC rating of 28 for construction grade window panes.

Compliance with these policies would reduce the impact to less than significant. No mitigation measures are required.

- b-d. Construction of the Phase One and Phase Two improvements have the potential to expose nearby residences and park users to unacceptable levels of noise over a relatively short period of time. The Plan Policy HZ-3.7 includes performance standards and thresholds to reduce exposures to construction noise. Performance standards include limiting the hours of construction, placing stationary noise sources farther from sensitive receptors and using properly muffled equipment during construction. The District Plan includes implementing measures to reduce the effects of construction noise.

Implementation Action HZ-3.7. The District will include the following language on all construction documents:

- a. Construction shall be limited to weekdays between 7 AM and 7 PM, and on Saturdays between 8 AM and 6 PM, with no activity on Sundays and holidays;
- b. All internal combustion engine-driven equipment shall be equipped with mufflers that are in good condition and appropriate for the equipment; and
- c. Stationary noise-generating equipment shall be located as far as possible from sensitive receptors at the residences on Topaz Street and users of the adjoining park.

Compliance with Policy HZ-3.8 would reduce the impact to less than significant. No mitigation measures are required.

- e,f. The project site is not located within an airport land use plan, or in proximity to a private air strip.

12. POPULATION AND HOUSING

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a-c. The proposed project is the construction of school facility improvements and does not include residential uses or displace housing. The Phase One improvements are intended to serve existing SUESD needs. Phase Two improvements would be constructed if school attendance warrants.

13. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or 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 following public services:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Fire protection? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks? (2,3,6,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities? (2,3,6,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

- a,b. The project site is located within the existing service areas for the police and fire protection services and a school use on this site is not anticipated to substantially affect response times. The Department of Education requires school districts to prepare and keep current a Safety Plan for all District facilities. The SUESD Safety Plan includes protocols for maintenance of access routes and safe environments on school grounds. With implementation of Phase One and Phase Two school facility improvements, SUESD will amend its existing Safety Plan to include the new elementary school facility.
- c. The project includes the construction of a public preschool and elementary school facility on the site.
- d,e. The proposed project is the construction of a public elementary school and a policy document to guide future public use of the site. The project allows retention of most of the recreational amenities and the City of Capitola Community Center on the site at least during the remainder of the original term of the terminated lease. During that period, all of the existing play areas will remain available for the public, when not in use by SUESD. SUESD currently makes other school grounds available for youth athletic leagues and other public uses as provided by the Civic Center Act, which would continue at implementation of the Phase Two improvements. The District Plan calls for SUESD to continue cooperating with the City of Capitola and other agencies to continue to allow open space, recreational uses and community programs on the western portion of the site to the extent consistent with SUESD’s use of the site at least during the remainder of the

original term of the terminated lease, and to coordinate shared use of the school playgrounds and field after school hours and when school is not in session, at least during the remainder of the original term of the terminated lease. The District Plan includes the following policies and implementing actions:

Policy PR-1. Continue to allow compatible existing park facilities on the site, as outlined in the Plan or as relocated on the site and determined to be feasible to the extent consistent with the District's use of the site at least during the remainder of original term of the expired lease.

Implementation Action PR-1.1. The District will cooperate with the City and other agencies, as appropriate and feasible, to continue to allow existing open space, recreational uses and community programs on the western portion of the site to the extent consistent with the District's use of the site at least during the remainder of original term of the expired lease.

Implementation Action PR1.2. At implementation of Phase One, the existing soccer field, tennis courts, basketball court and public restrooms will remain available for public use to the extent consistent with the District's use of the site at least during the remainder of original term of the expired lease.

Implementation Action PR-1.3. At implementation of Phase Two, the District will relocate the soccer field to an alternate suitable location either on the western portion of the site or will make other District playfields available for that use at least during the remainder of original term of the expired lease.

Policy PR-2. Continue to allow compatible shared use of park and school facilities to the extent consistent with the District's use of the site at least during the remainder of original term of the expired lease.

PR-2.1 To the extent deemed feasible for the District, the District will coordinate with the City shared public use of the school playgrounds and field after school hours and when school is not in session, at least during the remainder of the term of the expired lease.

As such, the project maintains public use of the site and facilities, at least during the remainder of the original term of the terminated lease, when the City's right to use the District's property for such purposes would have expired anyway. No mitigation is required.

14. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
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? (14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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? (14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>

Comments:

- a,b. The proposed project may increase the use of recreational amenities on the site by increasing the number and frequency of users of the site for the school use; however, the project is nonresidential and would not generate an increase in population that would require additional parks and open space or generate substantial additional use of the site. It is assumed that programs conducted through the community center may experience an incremental increase in enrollment as a result of the school use on the site, which could, in turn, accelerate maintenance demands on the site, but any increase in use would be considered less than significant due to the small scale of the proposed school, and would likely not require the construction of additional facilities.

15. TRANSPORTATION/TRAFFIC

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)? (2,3,14,16,17)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? (2,3,14,16,17)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (2,3,14,17,28)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
e. Result in inadequate emergency access? (14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
f. Result in inadequate parking capacity? (2,3,4,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks, etc.)? (2,3,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

- a. The District Plan and its proposed elementary school will generate an increase in traffic on nearby roadways and is anticipated to contribute to pedestrian and bicyclist presence on streets in the immediate vicinity of the Plan area. The neighborhood is developed in a standard grid pattern of local streets with curbs, gutters and sidewalks present in most areas. The site is accessible from 47th Avenue by way of Portola Drive to the south, and from Jade Street by way of 45th Avenue to the north. Forty Fifth Avenue and 47th

Avenue are the major access routes within the neighborhood and are categorized as collector routes by the City's general plan. Topaz Street connects Jade Street with 49th Avenue. Topaz Street is a narrow street with public parking on both sides.

A traffic report and subsequent correspondence have been prepared for the Phase One and Phase Two school improvements (Hatch Mott MacDonald, 2009, and Higgins 2009). The report and letter are presented as Appendix B of the District Plan. According to the report, operations of the Phase One improvements would generate 282 vehicle trips per day during the week with 67 during the AM peak hour, 48 during the mid after noon peak hour and 44 in the PM peak hour. At buildout of Phase Two, the project would generate 1,184 trips with 335 trips occurring during the weekday AM peak hour, 232 occurring in the mid-afternoon peak hour and 161 trips occurring in the PM peak hour. Vehicle trip generation includes trips in and out of the site; for example, during the morning peak hour, Phase One operations can be expected to generate 37 trips to the site and 30 from the site. Current SUESD policy includes "good neighbor" measures to reduce congestion in neighborhoods adjacent to school uses. The District Plan includes the following implementation actions to reduce the effects of additional traffic in the neighborhood.

Implementation Action C-4.1. The District will provide bicycle parking on the school grounds, consistent with the Division of the State Architect Standards for the design of school facilities.

Implementation Action C-4.2. The District will refer parents to the County Transportation Commission carpool programs.

Implementation Action C-5.1. The District will provide ongoing communications directing parents to safe alternative routes to reduce congestion.

Implementation Action C-5.2. The District shall work with the City to coordinate school and community center scheduling to avoid heightening traffic peaks at the beginning and end of the school day.

Responding to concerns made by the City of Capitola regarding additional traffic in the "Jewel Box" neighborhood, the traffic engineer notes that approximately two percent of project-related traffic is expected to use Topaz Street between 45th Avenue and 47th Avenue (Hatch Mott MacDonald 2009). For Phase One operations, a two percent increase would equal about five to six cars per day. The increase in vehicle trips would occur only when school is in session and is considered less than significant. For the Phase Two operations, the increase would equate to about 23 to 24 cars per day, with about six or seven trips during the AM peak hour, which is also considered less than

significant, but could be noticeable to residents on Topaz Street during peak hours when school is in session. No mitigation is required; however, the District Plan includes policies to reduce the effects of additional traffic on neighborhood streets including installation of a speed bump on Topaz Street between 47th Avenue and 49th Avenue, prior to occupancy of the Phase Two improvements.

Implementation Action C-6.2. The District will be responsible for funding the construction of a speed bump on the Topaz Street segment located between 45th Avenue and 47th Avenue, to mitigate the Phase Two increase in traffic. The funding shall be provided by the District prior to occupancy of the Phase Two improvements.

- b. The City of Capitola General Plan Circulation Element Policy 1 states “Level of Service C shall be the acceptable standard for circulation within the City with the exception of the Village area”. The general plan also identifies an average wait time of about 25 seconds for intersection delays and notes that although many of the interior streets of the City operate at LOS C or better, congestion is common in many areas of the City during peak weekend and holiday travel times, especially along the coast, in the vicinity of the Village and on portions of 41st Avenue. Congestion also occurs during weekday peak hours along the arterial routes and Highway One to the east. The project site is not located in Capitola Village and accordingly, LOS C is the acceptable standard for traffic on nearby streets in the vicinity of the site. According to the traffic report, all traffic intersections in the vicinity of the site operate at LOS C or better, with the exception of the intersection of 45th Avenue and Capitola Road, which currently experiences LOS D and E conditions during mid afternoon and evening peak hours. Therefore, congestion impacts to this intersection would occur with or without the project.

The traffic report also studied the cumulative effects of the District Plan projects within the context of buildout of the general plan. The report notes that traffic volumes would be expected to increase from existing levels as new projects are developed with the Capitola area, but that most new growth will likely occur in the County. Growth rates established by the Association of Monterey Bay Area Governments (AMBAG) forecasts and expected 2015 buildout conditions identified in the Capitola General Plan were used to estimate peak hour volumes. The report concludes that traffic generated by the Phase Two improvements would contribute to general plan buildout conditions of LOS E and F at the already congested intersection of 45th Avenue and Capitola Road during weekday afternoon and evening peak hours, respectively. The report states that all other intersections in the vicinity of the site would operate at LOS C or better with the additional traffic generated by the project.

The traffic report analyzed signalization alternatives including partial and all way stop controls and dedicated right turn lane configurations for the 45th Avenue/Capitola Road intersection. None of the alternatives would eliminate the intersection deficiencies and cause the intersection to operate at LOS C or better. The traffic report recommends signalization of this intersection to relieve congestion and achieve LOS A during peak hours, and also recommends that SUESD contribute a proportionate share of traffic impact fees toward this improvement. In addition to the implementing actions listed above the District Plan also includes the following implementing actions to reduce impacts to LOS deficiencies.

Implementation Action C-6.1. The District will be responsible for the payment of fair share traffic impact fees for signalization of the intersection 45th Avenue and Capitola Road, to mitigate the District's impact on the intersection by Phase, prior to completion of construction of each Phase.

Implementation of this policy would offset the SUESD contribution to the unacceptable LOS and reduce the impact to less than significant. No mitigation is required.

- c. The project site is not located within the boundary of an Airport Land Use Plan and would have no effect on air traffic patterns.
- d. An active rail road grade crossing is located on 47th Avenue north of Portola Drive near the southeastern corner of the site. The crossing is conventionally controlled by warning lights and an automatic crossing gate. Implementation of one or both phases of the Opal Cliffs Elementary School project would increase vehicle, pedestrian and cyclist traffic near this crossing. An increase in traffic that would substantially increase the risks of conflict between trains, vehicles, cyclists and traffic would be considered a significant impact. The traffic report did not identify a significant increase in traffic at this intersection, but noted that the crossing is located within the proposed school 600-foot zone of influence and improvements to the pedestrian facilities at this crossing should also be considered.

Automatic crossing gates are triggered remotely by approaching trains to give advance notice to motorists and to halt traffic at the crossing. The Public Utilities Commission implements signal warrants at train crossings pursuant to Federal Highway Administrations Standards. According to the Railroad-Highway Grade Crossing Handbook (Federal Highway Administration 2007), automatic active controls such as crossing arm gates are common controls used for low volume traffic conditions and are very effective in improving safety and operations at rail road crossings. Factors that influence the use of automated gates include train speeds and frequency, passenger or freight, traffic volumes on the roadway and categories of nearby uses. According to the

Railroad Risk Analysis the rail line is used for freight operations between Watsonville and Davenport with a crossing twice per day. Train maximum speeds are low when travelling through the urbanized areas of Santa Cruz County and, in the vicinity of the project site, visibility is high along the tracks. Given the low speed of the train, infrequency of use, residential setting and relatively low volume existing and estimated traffic levels in the vicinity of the site, the current automatic gate controls are anticipated to sufficiently provide a safe crossing and the risks of conflict at the crossing are not substantially increased by the additional traffic. The impact is less than significant and no mitigation is required.

Nevertheless, since the crossing is within the proposed school zone of influence, the traffic report suggests that additional signalization of the crossing may be necessary to further improve safety and minimize potential conflicts between queued vehicles, pedestrians and cyclists. The traffic report recommends coordinating with the PUC and Union Pacific Railroad to determine appropriate intersection controls to reduce the risks between vehicle, pedestrian and cyclist conflicts. These recommendations are included in the following District Plan implementing actions.

Implementing Action C-7.1. The District will work with other agencies, as appropriate, including the Public Utilities Commission, Caltrans, and the Santa Cruz County Transportation Commission to coordinate the design of appropriate traffic and pedestrian controls at the 47th Avenue railroad crossing.

Implementing Action C-7.2. The District will actively communicate potential hazards associated with railroad crossings to parents and students.

Implementing Action C-7.3. The District will work with Caltrans and other agencies, as appropriate, to apply for Safe Routes to School funding to remedy impediments to walking and bicycling within the Opal Cliffs site attendance boundaries.

- e. The site is accessible from Jade Street and 47th Avenue, and is located within the existing Central Fire District service area. Implementation of the Phase One and Phase Two school improvements can be accommodated by existing levels of service.
- f. The proposed project would increase the availability of public parking on the site. The number of required off-street parking spaces for school uses are determined by the California Department of Education (CDE), and are based upon the number of staff for educational facilities. The requirements and other site standards for school facilities can be found on the CDE website at <http://www.cde.ca.gov/>. Proposed Phase One improvements to the site include expanding the central parking lot from 26 existing stalls

to 46 stalls, including two handicapped spaces and adding a one-way curbside pickup/drop-off zone, near the restroom building at the south end of the central parking lot. Head-in parking spaces are also provided on the north and east side of the central parking lot. No other changes to existing parking areas are proposed. At implementation of the Phase Two improvements, the project would replace two parking spaces with a dedicated loading zone for students; however, this improvement maintains the overall capacity of the parking lot because many of the spaces would be used only temporarily during school hours. The District Plan includes the following implementing actions to ensure adequate and safe parking facilities on the site.

Implementation Action. C-1.1 The District will maintain adequate parking on the site pursuant to Department of Education requirements.

Implementation Action. C-1.2 During the implementation of the Phase One improvements, the District will reconfigure and resurface the central parking lot to accommodate one lane of directional traffic, a minimum of 46 parking spaces for staff and visitors, including handicapped spaces, a minimum 24-foot backing distance for parking spaces, and a passenger loading area for parents and caregivers bringing or picking up students.

Implementation Action. C-1.3 The District will provide marked crosswalks and signage in the central parking lot as illustrated in Figures 7 and 8 of the Plan.

Implementation Action. C-2.1. Passenger loading areas shall be designed and placed according to applicable standards, including adequate separation between parking and loading areas, and in locations that avoid or minimize pedestrian travel in vehicle circulation aisles.

Implementation Action. C-2.2. During implementation of the Phase Two improvements, the District shall design and construct a dedicated loading zone for parents and Special Education Transportation Services vehicles as identified in this Plan.

- g. The proposed project maintains and improves pedestrian access on and around the site, and includes provisions encouraging alternative modes of transportation. District Plan implementing actions to promote alternative transportation are listed in Section 3, Air Quality. Defined pedestrian access ways are present between the community center and 47th Street and southward along the periphery of the site, adjacent to 47th Street. Unrestricted pedestrian access to the site is currently available from all neighborhood streets and the Union Pacific Railroad right-of-way. The Capitola General Plan proposes a pedestrian/bicycle trail along the Union Pacific Railroad right-of-way, should the

tracks be abandoned and converted to a trail use in the future. In addition to the access improvements described above (item d), the project includes access improvements on the site that would reconfigure existing pedestrian walkways and preserve future access opportunities to the Union Pacific Railroad right-of-way from the western portion of the site. The District Plan includes implementing actions to preserve and improve pedestrian access on the site and in the immediate vicinity.

Implementation Action C-3.1. The District will maintain a continuous pedestrian pathway adjacent to 47th Avenue between the north and south property lines of the District property.

Implementation Action C-3.3. The District will prepare a School Route Plan Map per the guidance contained in the Caltrans Traffic Manual to coordinate the design and placement of pedestrian facilities on area streets.

Implementation Action PA-1.1. The District will implement public access as illustrated on the Access Plans for each phase in a manner that does not compromise student safety.

Implementation Action PA-2.1. The District will cooperate with the Santa Cruz County Regional Transportation Commission and the City of Capitola to preserve public access opportunities related to the potential conversion of the Union Pacific Railroad right-of-way to a public trail.

No mitigation is required.

16. UTILITIES AND SERVICE SYSTEMS

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (6,9,10,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (6,9,10,14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (2,3,11,14,24)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (14,24,25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
e. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (6,10)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid-waste disposal needs? (2,3,5,14)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste? (2,3,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓

Comments:

a,b,e. Existing buildings and restroom facilities on the project site are connected to the existing sanitary sewer system operated by the Santa Cruz County Sanitation District. According to the county website, current wastewater generation within the service area is about five (5) to six (6) million gallons per day (mgd). The County Sanitation District has a

treatment capacity agreement with the City of Santa Cruz which will accept eight (8) mgd. The collection system in the vicinity of the site consists of an eight-inch sewer main on Jade Street, which is then conveyed to a 16-inch force main on Portola Drive and ultimately to the City of Santa Cruz wastewater treatment plant at Neary Lagoon. According to information obtained from the City of Santa Cruz website, the treatment facility has a design capacity of 17 million mgd, with an average flow of 10 mgd.

Using the estimated water demand identified in the District Plan, Table 1, Existing and Proposed Water Demand, sewer generation for the Phase One and Phase Two improvements would be no more than about 14,800 gallons per day for Phase One and about 51,400 gallons per day for Phase Two, which combined, is approximately 66,200 gallons per day, or 0.07 mgd per day. Actual sewer generation would be less because the District Plan water demand estimates do not distinguish between interior and exterior use. Exterior water use would not enter the sanitary sewer system. According to correspondence received from the Santa Cruz County Sanitation District, the proposed school use would be accommodated by the existing collection system located on Jade Street. New sewer laterals would be subject to County design standards and performance thresholds. Therefore, the amount of sewer generated by the Phase One and Phase Two improvements would not exceed wastewater treatment standards or capacity of the existing system and the impact is less than significant. No mitigation is required.

- c. As described in Section 8, Hydrology and Water Quality, the existing storm water drainage system in the City of Capitola consists of a series of curbs, gutters, and storm drains. In the vicinity of the site, storm drainage is captured by this system and conveyed south under 47th Avenue, then east along Opal Cliffs Drive prior to discharge into Monterey Bay. The project site is connected to the existing storm drain system by way of catch basins in turf play fields and a storm drain in the main parking lot. The proposed project includes site improvements that would increase impermeable surfaces on the site and has the potential to generate storm water runoff that could affect the capacity of the storm drain system. New improvements on the project site are subject to the provisions of the Santa Cruz County/City of Capitola 2003 Storm Water Management Plan (SWMP). The project includes design elements and policies to ensure that the volume of storm water run off from the site does not exceed existing levels, consistent with the SWMP. Drainage within improved areas would be directed to landscaped bioswales contoured to retain runoff on the site. Policy and design provisions are included in the District Plan to achieve sustainable levels of storm drainage and adequate storm drain facilities on the site. Policy provisions are described in Section 8, Hydrology and Water Quality. With implementation of these policies, the project would not exceed the capacity of the existing storm drain system. Therefore the impact is less than significant. No mitigation is required.

- d. The City of Capitola obtains its water supply from wells operated by the Soquel Creek Water District (SqCWD). The project site is located within the service area and is connected to the SqCWD water distribution system. The proposed project includes improvements that will replace an existing community garden with a new preschool and elementary school in two phases. The District Plan compares the water use of the community garden with the anticipated water demand of the proposed Phase One and Phase Two school improvements. Existing water use was derived by the project architect using water bill information on file with SqCWD. The results are presented in the District Plan Table 1, Existing and Proposed Water Demand (page 6-2). According to the District Plan, the community garden consumed about 2.5 AFY. The anticipated water demand of the Phase One improvements is 0.34 AFY and anticipated demand for the Phase Two improvements is 1.18 AFY. Combined, the overall water demand on the site would increase by 1.52 AFY, which is less than the water consumed by the community garden use. Also, the school district has received written confirmation from the SqCWD that the proposed school improvements can be accommodated by existing water supply, provided that water conserving measures are included in all new construction. The SqCWD Will Serve letter is presented as Appendix J in the District Plan. Therefore, overall water demand on the site would not require additional water entitlements or an expansion of capacity and the impact is less than significant. No mitigation is required.
- f,g. The proposed project has the potential to increase solid waste generation and contribute to the City's demand for disposal services. Solid waste in the City of Capitola is disposed at the Marina landfill in Monterey County. State law requires the diversion of 50 percent of solid waste from disposal in landfills. According to the City of Capitola Public Works Department, the City currently diverts about 51 percent of its solid waste.

The City of Capitola Public Works Department is a sponsor of the Santa Cruz County Office of Education Public School Resource Program (PSCR), which aims to support educational programs to support solid waste reduction education and solid waste diversion programs with a goal of reaching zero waste in schools. The SUESD participates in the program, and the program will be extended to the Opal Cliffs Elementary School activities to reduce solid waste generation on the site. Therefore, the impact of an increase in solid waste generation is less than significant and no mitigation is required.

District implementing actions that reduce solid waste generation are as follows.

Implementation Action PF-6.1. The District will continue to participate in the Santa Cruz County Office of Education Public School Resource Program.

Implementation Action PF-6.2. The District will specify in construction bids that waste material is to be recycled, and to the extent feasible, recycled or similar sustainable building materials shall be utilized.

17. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less-than-Significant Impact with Mitigation Measures Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a. Does the project have the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory? (2,3,14,18,26,29)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
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) (2,3,15,16,17,19,20,30)	<input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? (8,9,13,20,22,23,28)	<input type="checkbox"/>	✓	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- a. According to the biological report prepared for the project, the project site is not located in an area of biological sensitivity and no special status species were observed during a field survey of the site. A number of trees are present on the project site that can provide habitat for nesting birds, which are protected under the federal Migratory Birds Act. The site is located in proximity to Soquel Creek and the Monterey Bay and storm water runoff from the site could potentially affect the water quality of these areas. As discussed in Section 4, Biological Resources, and Section 8, Hydrology and Water Quality, the District Plan includes policy provisions to avoid or minimize disruption of nesting birds during construction, and to ensure that urban pollutants are not transported into the storm drain system. According to a cultural evaluation and field survey, the site is does not contain known or indicators of historic or prehistoric resources.

- b. The proposed Phase two school improvements will contribute cumulatively to a decline in LOS for the 45th Avenue and Capitola Road intersection, which is expected to occur at buildout of City's general plan. The District Plan includes provisions for the determination and payment of impact fees to offset the SUESD share of traffic congestion at this intersection, upon implementation of the Phase Two improvements. With implementation of the District Plan policies discussed in Section 15, Transportation and Traffic, the impact is less than significant.

The proposed project would generate greenhouse gas emissions (GHG) that can affect climate change. The project's contribution is based on construction emissions and operational emissions. Construction emissions are temporarily generated and the District Plan includes policies that require reduced idling times and properly maintained equipment in compliance with MBUAPCD regulations. Primary sources of GHG emissions are the transportation and electricity generation sectors. The proposed project expands SUESD school services to provide a preschool within the District boundary, which is anticipated to reduce vehicle miles traveled. The proposed Phase One and Phase Two improvements include LEED-equivalent design features to reduce energy consumption, and corresponding GHG emissions. With implementation of the policy actions described in Section 3, Air Quality, the proposed project GHG emissions are not cumulatively considerable.

- c. The proposed project has the potential to affect local air quality and increase exposure to excessive noise levels during construction and will increase ambient noise levels on the site over the long term. Construction would generate temporary PM₁₀ emissions in an air basin that is in nonattainment for PM₁₀ and has the potential to affect the water quality of storm water run off. The District Plan policies and mitigation measures identified in Section 3, Air Quality, Section 8, Hydrology and Water Quality, and Section 11, Noise, reduce these effects to less than significant.

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All documents indicated in bold are available for review at the **Soquel Union Elementary School District Office, 620 Monterey Street, Capitola CA 95010 (831) 464-5630** during normal business hours.

All documents listed above are available for review at EMC Planning Group Inc., 301 Lighthouse Avenue, Suite C, Monterey, California 93940, (831) 649-1799 during normal business hours.

APPENDIX A

SOQUEL UNION ELEMENTARY SCHOOL DISTRICT
DRAFT OPAL CLIFFS PUBLIC WORKS PLAN
(ON CD ATTACHED TO INSIDE BACK COVER)

APPENDIX B

DRAFT OPAL CLIFFS PUBLIC WORKS PLAN
FINAL GREENHOUSE GAS EMISSIONS REPORT



Planning for Success.

FINAL GREENHOUSE GAS REPORT

SOQUEL UNION ELEMENTARY SCHOOL DISTRICT - OPAL CLIFFS

PREPARED FOR

Soquel Union Elementary School District

Revised January 20, 2010

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

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FINAL

GREENHOUSE GAS REPORT

Soquel Union Elementary School District - Opal Cliffs

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Urbemis 2007 Version 9.2.4 Combined Annual Emissions Reports

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INTRODUCTION

1.1 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Climate Change Understanding and Effects

The potential for human activities to have a significant effect upon the Earth's atmosphere and climate has become increasingly understood over the past several decades. It is now generally agreed that the emission of certain gases into the atmosphere has increased since the beginning of the industrial revolution to the point where the resulting changes to the Earth's atmosphere are affecting the Earth's climate.

Global climate change is caused by greenhouse gas (GHG) emissions, which are caused by several activities, including combustion of fossil fuels, deforestation, and land use change. GHGs play a critical role in the Earth's radiation budget by trapping infrared radiation emitted from the Earth's surface, which could have otherwise escaped to space. Prominent GHGs contributing to this process include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and certain hydro- and fluorocarbons. This phenomenon, known as the "greenhouse effect," keeps the Earth's atmosphere near the surface warmer than it would be otherwise and allows for successful habitation by humans and other forms of life.

Fossil fuel combustion releases carbon that has been stored underground into the active carbon cycle, thus increasing concentrations of GHGs in the atmosphere. Emissions of GHGs in excess of natural ambient concentrations are theorized to be responsible for the enhancement of the greenhouse effect and contribute to what is termed "global warming," a trend of unnatural warming of the Earth's natural climate. Increases in these gases lead to more absorption of radiation and warm the lower atmosphere further, thereby increasing evaporation rates and

temperatures near the surface. The three leading contributors to greenhouse gas emissions in California are on-road transportation (36 percent), electricity generation (23 percent, of which about half is generated out of state); and industry (20 percent).

According to California Energy Commission global warming could have the following effects on the state's environment at various locations:

- Rising sea levels along the California coastline, particularly in San Francisco and the Sacramento-San Joaquin River Delta due to ocean expansion;
- Extreme heat conditions, such as heat waves and very high temperatures, which could last longer and become more frequent;
- An increase in heat-related human deaths and infectious diseases and a higher risk of respiratory problems caused by deteriorating air quality;
- Reduced snow pack and stream flow in the Sierra Nevada, affecting winter recreation and water supplies;
- Potential increase in the severity of winter storms, affecting peak stream flows and flooding;
- Changes in growing season conditions that could affect California agriculture, causing variations in crop quality and yield; and
- Changes in distribution of plant and wildlife species due to changes in temperature, competition from colonizing species, changes in hydrologic cycles, changes in sea levels, and other climate-related effects.

Emissions Reduction Targets and Programs

Beginning in the 1990s, the federal and state governments have been setting greenhouse gas emission reduction targets and establishing programs to address climate change. In October 1993, President Clinton announced his Climate Change Action Plan, which had a goal to return GHG emissions to 1990 levels by 2000. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05. It included the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. To meet the targets, the Governor directed several state agencies to cooperate in the development of a Climate Action Plan. In 2006, the California state legislature adopted the California Global Warming Solutions Act of 2006 (AB32). AB32 establishes a cap on statewide GHG emissions and sets forth the regulatory framework to achieve the corresponding reduction in statewide emission levels. The AB 32

Scoping Plan was approved in December 2008 and contains the main strategies California will use to reduce the GHGs that cause climate change, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

The state energy efficiency regulations, which are implemented through the state's Title 24 building energy efficiency standards, were first adopted in 1978. Since that time, California's per-capita energy use has remained essentially level, while the United State's per-capita energy use has increased by 50 percent. The California Energy Commission (CEC) has adopted a policy for all new commercial construction in California to meet zero net energy by 2030 (CEC 2007). The Title 24 energy efficiency regulations were updated with more stringent requirements in January 2010.

The U.S. Energy Independence and Security Act of 2007 (EISA) specifies a zero-energy use target for 50 percent of the nation's commercial buildings by 2040, and for all U.S. commercial buildings by 2050.

1.2 PROJECT CHARACTERISTICS

The Opal Cliffs Public Works Plan calls for the development of a pre-school/elementary school in two phases. Phase One is the development of a preschool, kindergarten and first grade classrooms with an administration building to serve about 80 total students. Phase Two is the development of classrooms and ancillary facilities for grades 1 through 5 with a total of about 400 students. The existing community garden and soccer field would be removed. The Opal Cliffs Public Works Plan includes provisions to allow the non-school uses of existing park facilities for at least until the end of the original term of the terminated lease with the City of Capitola, provided these uses do not conflict with school uses.

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2.0 EMISSIONS ESTIMATES

2.1 METHODOLOGY

GHG emissions were estimated for construction and operational phases of the project. Construction emissions were estimated using URBEMIS 7G Version 9.2.4 modeling software produced by the Air Resources Board. Landscape maintenance and vehicular emissions associated with the project were also generated using the URBEMIS 7G modeling software. Emissions related to on-site electricity use was estimated using the California Climate Action Registry General Reporting Protocol version 3.1 (January 2009) and default emissions values for electrical generation. Assumptions used are noted in each discussion below.

GHG emissions inventories are expressed in metric tons. The outputs from URBEMIS 7G are expressed in tons (“U.S. tons” or “short tons”) and the results of the electrical demand calculations are expressed in pounds. These results are converted into metric tons in each table.

2.2 CONSTRUCTION EMISSIONS

URBEMIS 7G modeling software directly estimates CO₂ emissions from construction activities. For purposes of the greenhouse gas emissions projection, it is assumed that each phase will result in disturbance of about 2.5 acres of land and that each phase will result in about one acre of asphalt paving. Each phase is assumed to consist of fine grading, paving, building construction, and painting. Phase One of the project is assumed to be developed during 2010 and, although Phase Two may never be constructed, for purposes of modeling CO₂ emissions during construction, Phase Two is assumed to be constructed during 2015.

Based on these assumptions the URBEMIS 7G Version 9.2.4 modeling indicates that the project would result in 74.26 tons of CO₂ emissions during the first construction phase and 73.09 tons of CO₂ emissions during the second construction phase. Most of these emissions would result from grading and paving activities. Total construction emissions would be about 147.35 tons.

Table 1 Construction CO₂ Emissions Summary

Phase	CO ₂ Emissions U.S. Tons	CO ₂ Emissions Metric Tons
Phase One Construction	74.26	67.35
Phase Two Construction	73.09	66.29
Total	147.35	133.64

Source: URBEMIS 7G, California Climate Action Registry 2009, and EMC Planning Group Inc. 2009

2.3 VEHICULAR EMISSIONS

URBEMIS 7G directly estimates CO₂ emissions. URBEMIS 7G also provides an estimate of total vehicle miles traveled, which can be used to estimate emissions of CH₄ and N₂O. The traffic report estimates that the project will generate 2.96 daily trips per student (282 trips during Phase One and 902 additional trips during Phase Two). Based on these assumptions the URBEMIS 7G modeling software estimates that the project would result in 6,086 total vehicle miles traveled each year (at project build-out), and that total CO₂ emissions would be about 1,033.18 tons per year. However, because the school year includes only about 180 class days, the daily traffic generation would actually occur only about half the days of the year. Therefore, the annual vehicle miles traveled and annual emissions have been adjusted to 50 percent of the values estimated by URBEMIS (3,043 miles and 517 tons of CO₂).

CH₄ and N₂O emissions are based on per mile factors of 0.06 grams and 0.05 grams respectively. Therefore, CH₄ emissions would be 183 grams and N₂O emissions would be 152 grams each year. CH₄ is converted to CO₂ equivalents by multiplying by a factor of 21. N₂O emissions are converted to CO₂ equivalents by multiplying by a factor of 310. Therefore, annual CH₄ and N₂O emissions expressed as CO₂ equivalents would be 3,843 grams and 47,167 grams respectively.

URBEMIS 7G modeling software returned an estimate of 0.25 tons per year of CO₂ from landscape maintenance operations.

Table 2 summarizes vehicular CO₂ equivalent emissions.

Table 2 Annual Vehicular CO2 Equivalents Emissions at Build-out

GHG	Derivation/Calculation of Estimate	CO ₂ Equivalents
CO ₂	URBEMIS 7G (adjusted to 50 percent of annual)	517
CH ₄	VMT x 0.06 g/mile x 21 equivalence conversion x 907,185 g/ton	0.004
N ₂ O	VMT x 0.05 g/mile x 310 equivalence conversion x 907,185 g/ton	0.052
Total	U.S. Tons	517.10
	Metric Tons	468.97

Source: URBEMIS 7G, California Climate Action Registry 2009, and EMC Planning Group Inc. 2009.

2.4 BUILDING EMISSIONS

Operational building emissions will result from electrical generation that occurs off-site at PG&E facilities or at facilities from which PG&E purchases electrical power. GHG emissions from electrical generation vary depending on the source of power. This estimate uses a CO₂ emission factor that is published by PG&E and accounts for PG&E's current energy generation portfolio. Other factors are used for CH₄ and N₂O. The factors used are 0.524 pounds CO₂ per kwh, 0.0000067 pounds CH₄ per kwh, and 0.0000037 pounds N₂O per kwh. Estimated annual power usage was estimated by the project architect in kvah (kilo volt-amp hours) and converted to kilowatt hours (kwh) using a power factor of 0.85. The annual Phase One power demand for the project is estimated to be 205,979 kwh and the annual Phase Two demand is estimated to be 343,227 kwh. Total project demand for electricity is estimated to be 549,206 kwh per year.

Using the estimated annual electricity demand, and the current standard emissions factors, the project is estimated to result in emissions of about 287,784 pounds of CO₂, four pounds CH₄, and two pounds N₂O- per year from power generation. [Table 3](#) summarizes the calculations for electricity-related GHG emissions and expresses the result in pounds of CO₂ equivalents.

Table 3 Electricity Generation GHG Emissions

GHG	Derivation/Calculation of Estimate	CO₂ Equivalents
CO ₂	549,206 kwh x 0.524 lbs/kwh	287,784
CH ₄	549,206 kwh x 0.0000067 lbs/kwh x 21 equivalence conversion	84
N ₂ O	549,206 kwh x 0.0000037 lbs/kwh x 310 equivalence conversion	630
Total	Pounds	288,498
	U.S. Tons	144.25
	Metric Tons	130.83

Source: California Climate Action Registry 2009 and EMC Planning Group Inc. 2009.

3.0 EMISSIONS SUMMARY

Table 4 provides a summary of GHG emissions from each identified source, and converts the emissions inventory into metric tons of CO₂ equivalents. One U.S. ton is equal to 0.907 metric tons. One pound is equal to 0.000454 metric tons. The construction phase results in the greatest CO₂ emissions, equal to about nine years of operational emissions. Although the project would result in CH₄ and N₂O emissions, those emissions round to much less than one metric ton, and are not included in Table 4.

The project proposes to generate a portion of its electrical needs through on-site photovoltaic panels. It is estimated that at least half of the project's electrical demand could be met through on-site solar electricity. Most of the neighborhoods near the project site are built at medium density and sidewalks and bike lanes are common. This factor encourages walking and bicycling, and it is likely that a higher than average percentage of students will arrive by non-motorized means. URBEMIS 7G results suggest that the presence of sidewalks and bike lanes in the area could reduce vehicle trips by more than five percent.

Table 4 GHG Emissions Summary (Metric Tons CO₂ Equivalents)

Source/GHG	Single Year Emissions	Ongoing Annual Emissions
Phase One Construction		
CO ₂	67	--
Phase Two Construction		
CO ₂	66	--
Vehicles		
CO ₂	--	469
CH ₄	--	0
N ₂ O	--	0
Electricity		
CO ₂	--	131
CH ₄	--	0
N ₂ O	--	0

Source: URBEMIS 7G, California Climate Action Registry 2009, and EMC Planning Group Inc. 2009.

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APPENDIX

URBEMIS 2007 VERSION 9.2.0
COMBINED ANNUAL EMISSIONS REPORTS

Urbemis 2007 Version 9.2.4

Combined Annual Emissions Reports (Tons/Year)

File Name: G:\Projects\CS Projects\300-399 Series\CS-378 (Opal Cliffs Elementary School CDP)\Deliverables\GHG Report\Opal Cliffs Urbemis Model.urb9

Project Name: Opal Cliffs School for GHG emissions

Project Location: Santa Cruz County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
2010 TOTALS (tons/year unmitigated)	0.40	0.69	0.53	0.00	0.04	0.04	0.08	0.01	0.04	0.05	74.26
2010 TOTALS (tons/year mitigated)	0.37	0.69	0.53	0.00	0.01	0.04	0.05	0.00	0.04	0.04	74.26
Percent Reduction	7.52	0.00	0.00	0.00	75.98	0.00	33.71	75.03	0.00	11.63	0.00
2015 TOTALS (tons/year unmitigated)	0.37	0.47	0.44	0.00	0.04	0.03	0.06	0.01	0.03	0.03	73.09
2015 TOTALS (tons/year mitigated)	0.37	0.47	0.44	0.00	0.04	0.03	0.06	0.01	0.03	0.03	73.09
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

AREA SOURCE EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	0.04	0.00	0.14	0.00	0.00	0.00	0.25
TOTALS (tons/year, mitigated)	0.04	0.00	0.14	0.00	0.00	0.00	0.25
Percent Reduction	0.00	NaN	0.00	NaN	NaN	NaN	0.00

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	1.17	0.96	8.52	0.00	0.84	0.16	450.27
TOTALS (tons/year, mitigated)	1.12	0.91	8.03	0.00	0.79	0.15	424.22
Percent Reduction	4.27	5.21	5.75	NaN	5.95	6.25	5.79

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	1.21	0.96	8.66	0.00	0.84	0.16	450.52
TOTALS (tons/year, mitigated)	1.16	0.91	8.17	0.00	0.79	0.15	424.47
Percent Reduction	4.13	5.21	5.66	NaN	5.95	6.25	5.78

Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
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2015	0.37	0.47	0.44	0.00	0.04	0.03	0.06	0.01	0.03	0.03	73.09
Fine Grading 05/28/2015-06/11/2015	0.01	0.10	0.06	0.00	0.04	0.00	0.04	0.01	0.00	0.01	12.94
Fine Grading Dust	0.00	0.00	0.00	0.00	0.04	0.00	0.04	0.01	0.00	0.01	0.00
Fine Grading Off Road Diesel	0.01	0.10	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.36
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58
Asphalt 07/05/2015-08/11/2015	0.02	0.12	0.12	0.00	0.00	0.01	0.01	0.00	0.01	0.01	15.82
Paving Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	0.02	0.12	0.09	0.00	0.00	0.01	0.01	0.00	0.01	0.01	13.22
Paving On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12
Paving Worker Trips	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.49
Building 07/05/2015-10/22/2015	0.04	0.25	0.25	0.00	0.00	0.01	0.01	0.00	0.01	0.01	43.95
Building Off Road Diesel	0.03	0.24	0.17	0.00	0.00	0.01	0.01	0.00	0.01	0.01	35.29
Building Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.11
Building Worker Trips	0.00	0.01	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.56
Coating 09/30/2015-11/05/2015	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.37
Architectural Coating	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.37

Phase Assumptions

Phase: Fine Grading 5/28/2010 - 6/11/2010 - Phase 1 grading

Total Acres Disturbed: 1.3

Maximum Daily Acreage Disturbed: 0.32

Fugitive Dust Level of Detail: Default

20 lbs per acre-day

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On Road Truck Travel (VMT): 0

Off-Road Equipment:

- 1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day
- 1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day
- 1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day
- 1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Fine Grading 5/28/2015 - 6/11/2015 - Phase 2 grading

Total Acres Disturbed: 1.3

Maximum Daily Acreage Disturbed: 0.32

Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

- 1 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day
- 1 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day
- 1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day
- 1 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Paving 7/5/2010 - 8/11/2010 - Phase 1 paving

Acres to be Paved: 0.32

Off-Road Equipment:

- 4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day
- 1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day
- 1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day
- 1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

Phase: Paving 7/5/2015 - 8/11/2015 - Phase 2 paving

Acres to be Paved: 0.32

Off-Road Equipment:

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4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

Phase: Building Construction 7/5/2010 - 10/22/2010 - Phase 1 building

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 4 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

Phase: Building Construction 7/5/2015 - 10/22/2015 - Phase 2 building

Off-Road Equipment:

1 Cranes (399 hp) operating at a 0.43 load factor for 4 hours per day

2 Forklifts (145 hp) operating at a 0.3 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day

Phase: Architectural Coating 9/30/2010 - 11/5/2010 - Phase 1 coating

Rule: Residential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 100

Rule: Residential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Phase: Architectural Coating 9/30/2015 - 11/5/2015 - Phase 2 coating

Rule: Residential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 100

Rule: Residential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

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2015	0.37	0.47	0.44	0.00	0.04	0.03	0.06	0.01	0.03	0.03	73.09
Fine Grading 05/28/2015-06/11/2015	0.01	0.10	0.06	0.00	0.04	0.00	0.04	0.01	0.00	0.01	12.94
Fine Grading Dust	0.00	0.00	0.00	0.00	0.04	0.00	0.04	0.01	0.00	0.01	0.00
Fine Grading Off Road Diesel	0.01	0.10	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.36
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.58
Asphalt 07/05/2015-08/11/2015	0.02	0.12	0.12	0.00	0.00	0.01	0.01	0.00	0.01	0.01	15.82
Paving Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	0.02	0.12	0.09	0.00	0.00	0.01	0.01	0.00	0.01	0.01	13.22
Paving On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12
Paving Worker Trips	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.49
Building 07/05/2015-10/22/2015	0.04	0.25	0.25	0.00	0.00	0.01	0.01	0.00	0.01	0.01	43.95
Building Off Road Diesel	0.03	0.24	0.17	0.00	0.00	0.01	0.01	0.00	0.01	0.01	35.29
Building Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.11
Building Worker Trips	0.00	0.01	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.56
Coating 09/30/2015-11/05/2015	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.37
Architectural Coating	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.37

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Fine Grading 5/28/2010 - 6/11/2010 - Phase 1 grading

For Soil Stabilizing Measures, the Apply soil stabilizers to inactive areas mitigation reduces emissions by:

PM10: 84% PM25: 84%

For Soil Stabilizing Measures, the Replace ground cover in disturbed areas quickly mitigation reduces emissions by:

PM10: 5% PM25: 5%

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For Soil Stabilizing Measures, the Water exposed surfaces 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Soil Stabilizing Measures, the Equipment loading/unloading mitigation reduces emissions by:

PM10: 69% PM25: 69%

The following mitigation measures apply to Phase: Architectural Coating 9/30/2010 - 11/5/2010 - Phase 1 coating

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

Area Source Unmitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

<u>Source</u>	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
Natural Gas							
Hearth							
Landscape	0.01	0.00	0.14	0.00	0.00	0.00	0.25
Consumer Products							
Architectural Coatings	0.03						
TOTALS (tons/year, unmitigated)	0.04	0.00	0.14	0.00	0.00	0.00	0.25

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Area Source Mitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Annual Tons Per Year, Mitigated

<u>Source</u>	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
Natural Gas							
Hearth							
Landscape	0.01	0.00	0.14	0.00	0.00	0.00	0.25
Consumer Products							
Architectural Coatings	0.03						
TOTALS (tons/year, mitigated)	0.04	0.00	0.14	0.00	0.00	0.00	0.25

Area Source Mitigation Measures Selected

Mitigation Description

Percent Reduction

Area Source Changes to Defaults

Operational Unmitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Annual Tons Per Year, Unmitigated

<u>Source</u>	<u>ROG</u>	<u>NOX</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM25</u>	<u>CO2</u>
Elementary school	1.17	0.96	8.52	0.00	0.84	0.16	450.27
TOTALS (tons/year, unmitigated)	1.17	0.96	8.52	0.00	0.84	0.16	450.27

Operational Mitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Annual Tons Per Year, Mitigated

<u>Source</u>	<u>ROG</u>	<u>NOX</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM25</u>	<u>CO2</u>
Elementary school	1.12	0.91	8.03	0.00	0.79	0.15	424.22

TOTALS (tons/year, mitigated)	1.12	0.91	8.03	0.00	0.79	0.15	424.22
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Operational Mitigation Options Selected

Residential Mitigation Measures

Nonresidential Mitigation Measures

Non-Residential Local-Serving Retail Mitigation

Percent Reduction in Trips is 0%

Inputs Selected:

The Presence of Local-Serving Retail checkbox was NOT selected.

Non-Residential Pedestrian/Bicycle Friendliness Mitigation

Percent Reduction in Trips is 5.79%

Inputs Selected:

The Number of Intersections per Square Mile is 200

The Percent of Streets with Sidewalks on One Side is 5%

The Percent of Streets with Sidewalks on Both Sides is 95%

The Percent of Arterials/Collectors with Bike Lanes or where Suitable,

Direct Parallel Routes Exist is 80%

Operational Settings:

Does not include correction for passby trips

Includes the following double counting adjustment for internal trips:

Residential Trip % Reduction: 0.00 Nonresidential Trip % Reduction: 0.00

Analysis Year: 2010 Season: Annual

Emfac: Version : Emfac2007 V2.3 Nov 1 2006

Summary of Land Uses

Land Use Type	Acreage	Trip Rate	Unit Type	No. Units	Total Trips	Total VMT
Elementary school		1.29	students	400.00	516.00	2,652.24
					516.00	2,652.24

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	44.6	2.0	97.1	0.9
Light Truck < 3750 lbs	18.7	2.7	92.5	4.8
Light Truck 3751-5750 lbs	19.9	1.0	98.5	0.5
Med Truck 5751-8500 lbs	6.9	1.4	98.6	0.0
Lite-Heavy Truck 8501-10,000 lbs	1.2	0.0	66.7	33.3
Lite-Heavy Truck 10,001-14,000 lbs	0.8	0.0	50.0	50.0
Med-Heavy Truck 14,001-33,000 lbs	1.1	9.1	18.2	72.7
Heavy-Heavy Truck 33,001-60,000 lbs	0.1	0.0	0.0	100.0
Other Bus	0.1	0.0	0.0	100.0
Urban Bus	0.1	0.0	0.0	100.0
Motorcycle	5.1	68.6	31.4	0.0
School Bus	0.1	0.0	0.0	100.0
Motor Home	1.3	7.7	84.6	7.7

Travel Conditions

	Residential			Commercial		
	Home-Work	Home-Shop	Home-Other	Commute	Non-Work	Customer
Urban Trip Length (miles)	11.8	8.3	7.1	11.8	4.4	4.4
Rural Trip Length (miles)	11.8	8.3	7.1	11.8	4.4	4.4
Trip speeds (mph)	30.0	30.0	30.0	30.0	30.0	30.0
% of Trips - Residential	32.9	18.0	49.1			
% of Trips - Commercial (by land use)						
Elementary school				10.0	5.0	85.0

Operational Changes to Defaults

SOQUEL UNION ELEMENTARY SCHOOL DISTRICT DRAFT OPAL CLIFFS PUBLIC WORKS PLAN PROJECT MITIGATION MONITORING PROGRAM

Introduction

CEQA Guidelines section 15097 requires public agencies to adopt reporting or monitoring programs when they approve projects subject to an environmental impact report or a negative declaration that includes mitigation measures to avoid significant adverse environmental effects. The reporting or monitoring program is to be designed to ensure compliance with conditions of project approval during project implementation in order to avoid significant adverse environmental effects.

The law was passed in response to historic non-implementation of mitigation measures presented in environmental documents and subsequently adopted as conditions of project approval. In addition, monitoring ensures that mitigation measures are implemented and thereby provides a mechanism to evaluate the effectiveness of the mitigation measures.

A definitive set of project conditions would include enough detailed information and enforcement procedures to ensure the measure's compliance. This monitoring program is designed to provide a mechanism to ensure that mitigation measures and subsequent conditions of project approval are implemented.

Monitoring Program

The basis for this monitoring program is the mitigation measures included in the project mitigated negative declaration. These mitigation measures are designed to eliminate or reduce significant adverse environmental effects to less than significant levels. These mitigation measures have been incorporated into the project description, which the Soquel Union Elementary School District has agreed to implement during and after implementation of the proposed project.

The attached list is proposed for monitoring the implementation of the mitigation measures. This monitoring checklist contains all appropriate mitigation measures in the mitigated negative declaration.

Monitoring Program Procedures

The Soquel Union Elementary School District will use the attached mitigation monitoring list for the project. The monitoring program will be implemented as follows:

1. Soquel Union Elementary School District will be responsible for coordination of the monitoring program, including the monitoring list. Soquel Union Elementary School District will be responsible for completing the monitoring list and distributing the list to the responsible individuals or agencies for their use in monitoring the mitigation measures, as may be applicable.
2. Each responsible individual or agency will then be responsible for determining whether the mitigation measures contained in the monitoring list have been complied with. Once all mitigation measures have been complied with, the responsible individual or agency should submit a copy of the monitoring list to the Soquel Union Elementary School District to be placed in the project file. If the mitigation measure has not been complied with, the monitoring list should not be returned to Soquel Union Elementary School District.
3. Soquel Union Elementary School District will review the list to ensure that appropriate mitigation measures included in the monitoring list have been complied with at the appropriate time. Compliance with mitigation measures is required for project approvals.
4. If a responsible individual or agency determines that a non-compliance has occurred, a written notice should be delivered by certified mail to the Soquel Union Elementary School District within 10 days describing the non-compliance and requiring compliance within a specified period of time.

MITIGATION MONITORING PROGRAM

Prior to Grading and Construction Activities

1. Reference: Mitigation Measure AQ-1

To control, to the greatest extent feasible, dust during grading, excavation and construction activities, Soquel Union Elementary School District will include the following MBUAPCD dust control measures into contracts for the proposed project:

- a. Water all active construction areas at least twice daily, or as required to control dust;
- b. Cover all trucks hauling dirt, sand, or loose material;
- c. Sweep streets within one day if necessary to remove dirt, sand, or loose material dropped from trucks hauling such material;
- d. Apply (non-toxic) chemical soil stabilizers on all unpaved access roads, parking areas and staging areas as well as on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
- e. Cover inactive storage piles;
- f. Limit traffic/equipment speed on unpaved surfaces to 15 mph, or less under windy conditions; and
- g. Plant vegetative ground cover in disturbed areas as soon as possible.

Party Responsible for Implementation and Monitoring: **Soquel Union Elementary School District**

Implementation Complete

Monitoring Notes and Status:



Planning for Success.

April 13, 2010

Mr. Judd Jordan
Lozano Smith, Attorneys at Law
4 Lower Ragsdale Drive, Suite 200
Monterey, CA 93940-5758

**Re: Response to the City of Capitola Comments – Soquel Union Elementary School
District Opal Cliffs Public Works Plan –Initial Study and Proposed Mitigated
Negative Declaration**

Dear Mr. Jordan:

The comment period for the above-referenced negative declaration began on February 26, 2010 and ended on March 29, 2010, and one comment letter from the City of Capitola was received. The CEQA Guidelines require formal responses to written comments received on an EIR, but do not require formal responses to comments made on mitigated negative declarations. The CEQA Guidelines Section 15074(b) requires a public agency to consider comments received prior to approving a project for which a mitigated negative declaration is proposed.

As a courtesy, EMC Planning Group Inc. provides responses to comments for the Lead Agency's use. This letter responds to points raised by the City of Capitola Community Development Department in a letter dated March 29, 2009 [sic]. Responses to each of the City's comments are provided below.

1. Air Quality

- a. The concern raised by the City is that the initial study fails to consider recent revisions to the CEQA Guidelines Appendix G (environmental checklist) regarding greenhouse gas (GHG) emissions and their contributions to climate change, and whether or not the proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The revised

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

Appendix G became effective on March 18, 2010. The Notice of Intent to adopt a Mitigated Negative Declaration for the project was filed on February 26, 2010, prior to the effective date of the revised checklist. The revised checklist was therefore not applicable at the time the initial study and proposed mitigated negative declaration was prepared. No further analysis is required.

Nevertheless, in anticipation of the CEQA Guidelines revisions, a GHG report was prepared for the project and is included as Appendix B of the initial study. Quantification and discussion of project-related GHG emissions and emissions-reducing policies and programs is found in the initial study (pp 30-34). As reported in the initial study, (p 32), the GHG report found that the amount of project-related GHG emissions represents about 0.00012 percent of California emissions, and about 0.042 percent of Santa Cruz County mobile GHG emissions, and are not cumulatively considerable.

- b. Refer to Response to Comment 1a for a discussion of applicability of the adopted CEQA Guidelines revisions to the proposed project. The GHG report discusses the California Air Resources Board (CARB) Scoping Plan (pp 1-2 – 1-3). In 2006, the California state legislature adopted the California Global Warming Solutions Act of 2006 (AB32). AB32 establishes a cap on statewide GHG emissions and sets forth the regulatory framework to achieve the corresponding reduction in statewide emission levels. The major proposed statewide actions for reducing GHG emissions are embodied in CARB *Climate Change Proposed Scoping Plan*, also referred to in the GHG report as the AB32 Scoping Plan, was adopted by CARB in December 2008. The Scoping Plan contains the main strategies California will pursue to reduce GHG emissions that cause climate change including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system (p 1-3).

The Scoping Plan also discusses the role of local governments in assisting with the implementation of AB 32. As stated on page 27 of the Scoping Plan:

In addition to tracking emissions using these protocols, ARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020.

As noted in the initial study on page 30, neither the City of Capitola or the County of Santa Cruz have yet to adopt thresholds of significance for GHG emissions or a

Climate Action Plan to reduce GHG emissions. As reported in the initial study (pp 33-34), the proposed project includes policies and design standards that reduce GHG emissions despite the determination that GHG emissions would not be cumulatively considerable. The proposed project would not conflict with adopted policies, programs or regulations adopted for the purpose of reducing GHG emissions. No further analysis is required.

2. Cultural Resources

- a. Project-related impacts to subsurface cultural resources that may be present on the site are discussed in the initial study Section 5, Cultural Resources, and in the proposed Public Works Plan (proposed project), which is included as Appendix A to the initial study. The Northwest Information Center was consulted and as a result, a cultural resource investigation of the site was conducted by Historic Resources Associates (HRA). The HRA report found no evidence of potential historic resources or cultural properties within the project site. A 1914 USGS Capitola Quadrangle (HRA, p 2) indicates that some structures were present in the vicinity of the project site, but none were located on the project site itself. A comparison of the 1914 USGS map with the USGS Soquel Quadrangle (HRA, Figure 1) demonstrates that no historic era structures remain adjacent to the project site.

Further discussion with Dana Supernowics of HRA (telephone com. April 12, 2010) provides additional clarification. According to Mr. Supernowics, all areas within the project site were surveyed. Additionally, there would be no reason to survey areas outside of the project site if the project does not propose ground disturbance off the site.

- b. Refer to response to comment 2a. The proposed project does not include off-site improvements, other than connection to existing utilities near the northern property line of the site, and therefore would have no effect on adjacent properties. No further analysis is required.
- c. Refer to the responses to comments 2a and 2b. The Northwest Information Center (NWIC) of the Historical Resources information System is one of twelve information centers affiliated with the State of California Office of Historic Preservation (OHP) in Sacramento. These Information Centers are non-profit organizations located at various universities, museums, and tribal organizations throughout the state of California. Each center serves a specific geographic area within the state. The NWIC service area includes 16 coastal Bay Area, and inland

counties, from Mendocino in the north to Monterey in the south. This area comprises 12 percent of the State of California. According to the NWIC website (www.sonoma.edu/nwic) the purpose of the center is to:

1. Manage historical resources records, reports, and maps;
2. Supply historical resources information to the private and public sector (some restrictions do apply);
3. Provide educational support and information about historical resources in California to the general public;
4. Compile and provide a referral list of qualified Historical Resources Consultants.

Neither the NWIC or the CEQA Guidelines define, or require the identification of, an "area of potential effect". The City's concern is that an "area of potential effect" is not identified for the project, when, in fact, the proposed project description of the initial study (page 11) identifies specific areas of the project site that would be physically affected by proposed construction activities, which are also reflected on the proposed site plans (Figures 5 and 6).

As shown on the project plans, the proposed project does not include the Union Pacific Railroad (UPRR) property, and the proposed school improvements would occur on the northeastern half of the project site. The UPRR right of way adjoins the south property line of the site; therefore, consultation with SHPO regarding the UPRR property's eligibility for the National Register of Historic Places is beyond the scope of the project. As reported in item 2a, above, there are no surviving historic period structures associated with the railway in the vicinity of the site and no evidence of historic or prehistoric resources was observed on the site during the field investigation. A copy of the initial study and proposed mitigated negative declaration was distributed to the Department of Parks and Recreation, Office of Historic Preservation and, although comment was requested, no comments were received. No further analysis is required.

3. Transportation/Traffic

- a. It is acknowledged that the City of Capitola has authority to determine appropriate mitigation for project-related traffic and transportation impacts within the City. The proposed project's traffic impacts are discussed in the initial study on pages 67-73. A traffic impact analysis was prepared for the proposed project and is included as an appendix to the proposed Public Works Plan (project) which is included in its

entirety as Appendix A to the initial study. The traffic impact report identified two potential traffic impacts that would occur as a result of the project and made recommendations to mitigate these impacts to less than significant.

The report identified potential impacts to the "Jewel Box" neighborhood and to the intersection of 45th Avenue and Capitola Road. Project-related traffic impacts to the Jewel Box neighborhood were determined to be less than significant by the initial study (pp 68-69). The proposed project includes Implementation Action C-6.2, which is based upon the traffic engineer's recommended traffic calming measure (speed hump) for Topaz Street between 47th Avenue and 49th Avenue. This calming measure was recommended in response to City concerns identified in comments on the draft Public Works Plan (City of Capitola March 9, 2009).

The traffic report also identified an existing and future LOS deficiency during peak hours at the intersection of 45th Street and Capitola Road and recommends that the District pay a proportionate share of traffic impact fee to offset its contribution to increased traffic at this intersection under general plan conditions. As reported in the initial study (p70), the project includes Policy C-6.1, which ensures that the District is willing to pay its fair share of proportionate traffic impact fees to offset the project's contribution to unacceptable LOS conditions.

- b. Traffic peak-hour volume data from the traffic report could be used as a starting point for negotiating the District's fair share of traffic impact fees for the 45th Street/Capitola Road intersection under cumulative general plan buildout conditions. According to the data contained in the traffic report, the proposed project's cumulative contribution to total cumulative traffic volume at the impacted 45th Street/Capitola Road intersection at general plan buildout would be about 1.3 percent for the Phase One improvements and about 4.2 percent for the Phase Two improvements during the PM peak hour.

As stated in the initial study (p 68), the traffic engineer anticipates that only about 2% of project traffic is expected to utilize Topaz Street. According to the peak-hour traffic volume data, the project's cumulative contribution to general plan buildout conditions would be about 0.7 percent for Phase One and about 2.8 percent for Phase Two during the PM peak hour.

4. Public Services and Recreation

- a. The project description does not include park closure because the proposed project does not include park closure. The proposed project also does not include a request

to amend the general plan land use designations for the site. As stated in the initial study, Section 9, Land Use and Planning, the existing Community Facilities-School, Parks and Open Space land use designations remain in effect for the proposed project and would remain unchanged. Expiration of the terminated lease would not affect existing land use designations or zoning. A discussion of impacts to public services and recreation is found on pages 64-65 of the initial study. As stated on page 65 of the initial study, the proposed project is the construction of a public elementary school and a policy document to "guide future public use of the site". There is no reasonably foreseeable means by which to determine that the site would not remain available for these public uses in the future.

The initial study correctly identifies that the Phase Two school improvements would reduce the size of the soccer field on the site, which would effectively eliminate its suitability as a soccer field; however, the project includes provisions for its relocation either elsewhere on the site or on other school fields in the District. Opportunities for public soccer facilities in the City of Capitola would therefore not be eliminated. The public would not lose a soccer field: the District currently makes other school grounds available for youth athletic leagues and other public uses as provided by the Civic Center Act, and this practice would continue at implementation of the Phase Two improvements. No additional analysis is required.

- b. The City's general plan does not include a parkland ratio policy or identify the total acreage of land designated as parks. The City's zoning ordinance also does not include requirements for the provision of parkland. However, Goal 4 of the City's Open Space, parks and Recreation Element states that the City will "make use of school sites as school-parks". As noted in the initial study (pp 64-65), the proposed project site carries a land use designation of Community Facilities-School, Parks and Open Space, and the proposed project is consistent with these designations.

The proposed project retains public use of the entire site. As reported in the initial study, pages 64-65, the project allows retention of most of the recreational amenities and the City of Capitola Community Center on the site as operated by the City, throughout the remainder of the original term of the terminated lease. During that period all play areas will remain available for public use including the school grounds when not in use by the school District. The availability of the soccer field for public use is not anticipated to change until the proposed Phase Two improvements are implemented. Once the Phase Two improvements are constructed, the public school grounds would be available for use by the public, provided that public use

does not interfere with the school use of the grounds. The City may or may not choose to pursue an a new location for a soccer field; however, the environmental effects of such a facility would not be the responsibility of the District when the project makes available for public use, other existing play fields within the District. Refer also to Response to Comment 4a. No further analysis is required.

- c. A discussion of the impacts to recreational facilities is found in the initial study Section 13, Public Services (pp 64-65), and in Section 14, Recreation (p 66). The City's concerns over park closure are addressed in Response to Comment 4a, above. The concerns related to increased use of other recreational facilities such that substantial deterioration of existing facilities would occur or new facilities would be required that would cause a significant effect on the environment are addressed in Response to Comment 4b, above. Therefore, as identified in Sections 13 and 14 of the initial study, and reiterated above, the impacts to recreational facilities are less than significant and no further review is necessary.

Please call me if you have any questions or comments regarding our responses to the comments received.

Sincerely,



Sally Rideout
Senior Planner

Encs City of Capitola Comment Letter dated March 29, 2010.
CEQANet State Clearinghouse Distribution Summary.



Received

MAR 29 2010

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Superintendent's Office

March 29, 2009

HAND DELIVERED AND SENT BY FIRST CLASS MAIL

Ms. Kathleen Howard
Superintendent
Soquel Union Elementary School District
620 Monterey Avenue
Capitola, California 95010

Subject: Comments on Initial Study and Proposed Mitigated Negative Declaration for the Draft Opal Cliffs Public Works Plan

Dear Ms. Howard:

The City of Capitola has reviewed the Initial Study and Proposed Mitigated Negative Declaration (Initial Study/Neg Dec) for the Soquel Union Elementary School District (SUESD) Draft Opal Cliffs Public Works Plan and is concerned that the potentially significant impacts associated with the proposed project have not been adequately evaluated. There are four areas of concern: air quality, cultural resources, transportation/traffic, and public services/recreation. Each of these topics areas is discussed below.

AIR QUALITY

The Initial Study/Neg Dec fails to address one of two new environmental checklist questions related to greenhouse gas emissions. Effective on March 18, 2010, the California Natural Resources Agency adopted amendments to CEQA guidelines, which included revisions to Appendix G (Environmental Checklist) adding the following questions:

- a) Generate greenhouse gas 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 greenhouse gases?

1b

The Initial Study/Neg Dec fails to address item (b), and the report should correct this omission by discussing, at a minimum, the California Air Resources Board Scoping Plan¹ to determine if there are any conflicts between it and the proposed project, as called for in the revised Appendix G of the CEQA Guidelines.

2. CULTURAL RESOURCES

The Initial Study/Neg Dec does not adequately analyze the project's effect on cultural resources. The report is deficient as outlined below:

- a) There is no substantial evidence to support conclusions that sidings and buildings associated with the Southern Pacific Railroad (SPRR) that were present adjacent to the site circa 1914 no longer exist.
- b) As a result of item (a), the Initial Study/Neg Dec is unresponsive to cultural resource concerns raised by the Northwest Information Center (NWIC).
- c) The adjacent railroad property should be evaluated for its potential for listing on the National Register of Historic Places, and this evaluation should include consultation with State Historic Preservation Office (SHPO).

2a

Lack of Substantial Evidence

The City contracted with Coastplans, a Santa Cruz-based environmental consulting firm that offers a range of comprehensive city and regional planning services, to review the cultural analysis conducted by HRA entitled: "Cultural Resources Study of the Opal Cliffs Project, 4400 Jade Street, Capitola, Santa Cruz County, California 95010" (December 2007). That review found no evidence that the Study included a field investigation into whether or not there were SPRR resources adjacent to the site.

According to the section entitled: Project Description and Summary of Findings (Page 1 of HRA report), the proposed project area studied by HRA was "bounded on the south by the Southern Pacific railroad tracks, on the east by 47th Street, and on the north by Jade Street." In the section entitled: Survey Methods and Field Inventory (Page 10 of the HRA report), the HRA report states that "a pedestrian survey was conducted within the project area, together with archival research." According to this description then, no pedestrian survey was conducted outside the project area by HRA.

2b

Concerns Raised by NWIC

Second, with regard to concerns raised by the NWIC, it is standard practice in evaluating cultural resource impacts to establish what is called an area of potential effect (APE) and to evaluate potential resources within that area. The APE is typically drawn to include the project

¹ See http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf for the ARB Scoping Plan.

26 site and immediately adjacent areas. In the case of the HRA study, however, no APE was established. As noted above, archival research (i.e., record search by the Northwest Information Center and the Native American Heritage Commission) concluded that "review of historical literature and maps indicated Southern Pacific Railroad sidings and buildings adjacent to the project area, as indicated on the 1914 USGS 15' Capitola Quadrangle Map [emphasis added]." The NWIC letter goes on to recommend the following:

If the area of potential effect contains such properties, such as railroad sidings and associated buildings related to the Southern Pacific Railroad adjacent to the project area, it is recommended that they be assessed by an architectural historian before commencement of project activities (NWIC, November 8, 2007)

Since there was no APE established and no field survey undertaken outside the project area, the Initial Study/Neg Dec fails to provide a basis upon which this NWIC recommendation can be considered.²

26 Consultation with SHPO

Finally, with regard to evaluation of the railroad property, if a more thorough methodology had been employed by HRA, two things would have happened—a field survey would have been undertaken in the areas adjacent to the project site (this may have provided substantial evidence that no SPRR sidings or buildings existed, at least above ground) and any potential historical resource located adjacent to the project site would have been evaluated for its significance. In this case, the SPRR track and right-of-way itself might have been recognized as a potential historic resource, and a consultation process with the State Office of Historic Preservation (SHPO) initiated to evaluate the property's potential for listing on the National Register of Historic Places. Such a consultation would also have evaluated any potential effect

² The HRA report treats the SPRR property inconsistently.

- ✓ Page 1 noted potential SPRR resources adjacent to the project area;
- ✓ Page 10 noted potential SPRR resources adjacent to the project area and then somehow reported in the next sentence that NWIC staff concluded that there was a moderate potential of identifying historic-period archaeological resources within the project area.
- ✓ Page 10 found that "after a careful field inspection of the entire project area, no significant prehistoric or historic archaeological sites, features, or artifacts were found, nor were any significant historic buildings, structures, or objects identified within the boundaries of the project."

Thus in the course of ten pages, a concern expressed by the NWIC about adjacent SPRR historical resources was transformed into a conclusion about historical resources on the project site, which was then dismissed based on field study.

the proposed SUESD project would have on the value of the adjacent potential historic resource.

Conclusions Regarding Cultural Resources

The analysis contained in the Initial Study/Neg Dec regarding cultural resources should be supplemented to include:

- a) The designation of an APE,
- b) A field survey covering the parts of the APE not covered in the current analysis,
- c) An analysis of the project's effect on any adjacent historical resources found within the APE, and
- d) Consultation with SHPO on the potential for listing the SPRR tracks on the National Register of Historic Places.

These actions would be responsive to the concerns expressed by the NWIC. Without these actions it appears impossible to draw a conclusion in the Initial Study/Neg Dec regarding the question: "Would the project cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5?"

3. Transportation/Traffic

Regarding Implementation Actions C-6.1 and C-6.2, the City of Capitola has not determined that the proposed mitigation measures are appropriate for the Capitola Rd./45th Ave intersection and Topaz St. The IS/ND should be revised to reflect that fact that:

1. The City has jurisdiction to determine the appropriate improvements on these streets taking into consideration a variety of factors including:
 - a. The compatibility of the improvements relative to the provision of emergency and public services,
 - b. Traffic and circulation considerations, and
 - c. Whether the improvements are warranted or not applying accepted traffic engineering standards.

The IS/ND states the School District will pay their fair share of the improvements when implemented by the City. The IS/ND does not address a formula or other methodology pursuant to which the School District's fair share of the costs of the proposed circulation-related mitigation measures would be calculated. Such a cost sharing agreement will need the approval of the City of Capitola before the District can reasonably conclude the undisclosed level of funding for circulation-related mitigation measures will reduce impacts to a less than significant level.

4. Public Services and Recreation

The Initial Study/Neg Dec does not adequately analyze the project's effect on public services and recreation. It is deficient in the following ways:

- a) The project description contained in the Initial Study/Neg Dec fails to include mention of park closure.
- b) The analysis contained in the Initial Study/Neg Dec regarding public services does not adequately analyze the proposed project's impact on loss of park space.
- c) The analysis contained in the Initial Study/Neg Dec regarding recreation does not adequately analyze the effect of park closure on other recreation facilities in the city.

4a Project Description

The Initial Study/Neg Dec makes no mention of the possibility of closing the site to some or all of the ongoing recreational uses. Yet, terminating some or all of the recreational uses on the site is an action that may be necessary to implement the SUESD's public works plan for the site.

The SUESD's argument seems to be that with termination of the lease the City would have lost the park space anyway, so the proposed project would not be responsible for converting a public park to some other use. That is not, however, entirely accurate. While the City's right to use the SUESD's property would have expired with the termination of the lease, there is nothing inherent in the termination of the lease that would inexorably lead to the loss of parkland.³ The SUESD's own proposed policies are the best evidence that park closure is not a foregone conclusion, as they allow for the possibility—but not the certainty—of continued park use beyond the end of lease.⁴

In the big picture, if the SUESD had not chosen years ago to embark on a path that would allow for development of a new school facility on its Jade Street property, the park use would probably have continued indefinitely. The SUESD is pursuing a course of action that includes the potential for ending recreational uses on the site—an outcome that would not be the case had it made other choices. This action should be included as part of the project description.

4b Impacts on Public Services

Had the Initial Study/Neg Dec properly acknowledged park closure as part of the project description, it would have had to more fully analyze the proposed project impacts on public services in the city. Instead, the Initial Study/Neg Dec argues that no mitigation is required

³ One can imagine a number of scenarios where recreational activities could continue in full or part, even with the termination of the existing lease. For example, the SUESD could choose to deed the property to the Santa Cruz County Land Trust for continued park use or, alternatively, it could drop Phase II of its project and deed the soccer field to the City for permanent, exclusive use.

⁴ Public Works Plan Land Use Policy Implementation LU-1.1: To the extent consistent with the District's use of the site, the District will permit the City, at least during the remainder of the original term of the expired lease, to continue to use the portions of the site not in use by the District, and implement, at the discretion of the Soquel Union Elementary School District Board, the proposed elementary school and related improvements on the eastern portion of the site as described herein. . . .

Ab

because the "project maintains public use of the site and facilities, at least during the remainder of the original term of the terminated lease, when the City's right to use the District's property for such purposes would have expired anyway." If the Initial Study/Neg Dec had fully analyzed the proposed project's impact on public services it might have found that it could "result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facility, the construction of which could cause significant environmental impacts."

Jade Street Park is an important recreational resource in Capitola. It represents over half of all the formal park space in the City of Capitola excluding the beach (approximately a third of the park space if you include the beach), and the soccer field at Jade Street Park is the only dedicated facility of its kind in Capitola. Table 1 summarizes existing park facilities within the City of Capitola.

Table 1: Existing Park Facilities

	Park	Area (ac)	% of Total (including beach)	% of Total (excluding beach)
1	Esplanade	0.2	0.6%	1.0%
2	Monterey	4.0	13.5%	22.8%
3	Noble Gulch	1.3	4.4%	7.4%
4	Cortez	1.1	3.7%	6.3%
5	Peery	0.8	2.6%	4.4%
6	Jade Street	9.6	32.5%	54.7%
7	Soquel Creek	0.6	2.0%	3.4%
8	Beach (estimated)	12.0	40.6%	--
		29.6	100.0%	100.0%

Source: City of Capitola, Coastplans

While the City would retain some use of the Jade Street facility, at least during Phase I of the project at least until the end of the lease period, it is possible the City could lose all use after the lease period expires. With Phase II, the City would lose the soccer field, whether or not it is allowed to use other parts of the facility after termination of the lease. As a result of the SUESD's project, the City would probably work to develop a new park and soccer field elsewhere to replace the Jade Street facility. The development of such a facility could have significant environmental effects, which should be investigated as part of the SUESD project Initial Study/Neg Dec. If the Initial Study/Neg Dec studied this issue and found a significant environmental effect, without some mitigation to reduce this impact to a level of less than significant, the SUESD would be required to undertake a full environmental impact report as a basis for making a finding of overriding consideration on this issue.

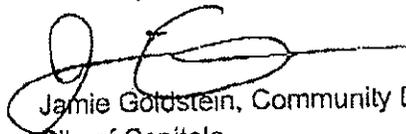
Impacts on Recreation

4c Under CEQA, prior to the implementation of a project a lead agency must determine whether the project would lead to an increase in 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. While the Initial Study/Neg Dec acknowledges that the community center may experience an incremental increase in enrollment as a result of the school use on the site, it offers no analysis on the effects of increased demand on other City parks, including the only other soccer field in the City—a smaller soccer field that is also used as a softball field at Monterey Park.

Again, if the project description had properly addressed park closure, the proposed project's impact on recreational resources would have been more fully evaluated. Without an analysis on the impacts on other parks the Initial Study/Neg Dec is inadequate.

If this analysis was included, the study would likely find that the loss of over half of the City's formal park space and the loss of its only dedicated soccer field could lead to overuse of other facilities such that substantial physical deterioration of the facilities would occur or be accelerated. If such potentially significant issues were identified, without mitigations to reduce this impact to a level of less than significant, SUESD would be required to undertake a full environmental impact report as a basis for making a finding of overriding consideration on this issue.

Sincerely,



Jamie Goldstein, Community Development Director
City of Capitola

cc: Capitola City Council
John Barisone, City Attorney
Susan Craig, California Coastal Commission

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California Home

Thursday, April 8, 2010



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Opal Cliffs Public Works Plan

SCH Number: 2010022073

Document Type: MND - Mitigated Negative Declaration

Project Lead Agency: Soquel Elementary School District

Project Description

The proposed project consists of the Soquel Union Elementary School District Opal Cliffs Public Works Plan and its provisions for an Elementary School Public Works Project, which covers the construction in two phases of public elementary school facilities and infrastructure on the site.

Contact Information

Primary Contact:

Kathleen Howard
Soquel Elementary School District
831-464-5630
620 Monterey Avenue
Capitola, CA 95010

Project Location

County: Santa Cruz
City: Capitola
Region:
Cross Streets: Jade St, 47th St
Latitude/Longitude: 36° 58' 11.58" / 121° 57' 31.45" [Map](#)
Parcel No: 034-551-02
Township:
Range:
Section:
Base:
Other Location Info:

Proximity To

Highways: One
Airports: No
Railways: UPRR
Waterways: Monterey Bay, Soquel Creek
Schools: Soquel Union ES District Facilities
Land Use: GP: Community Facilities-School, Parks and Open Space Z: Public Facilities, Coastal Zone Overlay: Park, School

Development Type

Educational

Local Action

Other Action

Project Issues

Aesthetic/Visual, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Cumulative Effects, Drainage/Absorption, Geologic/Seismic, Noise, Sewer Capacity, Solid Waste, Traffic/Circulation, Water Quality, Water Supply, Wetland/Riparian, Wildlife

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received: 2/26/2010 **Start of Review:** 2/26/2010 **End of Review:** 3/29/2010

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