

CHAPTER 5

OTHER CEQA CONSIDERATIONS

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. The EIR must also discuss (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, and (4) growth-inducing impacts of the proposed project. Chapter 2, Summary, and Chapter 4, Environmental Setting, Impacts, and Mitigation Measures, of this EIR provide a comprehensive identification and evaluation of the proposed Parks Master Plan's (Project's) environmental effects, mitigation measures, and the level of impact significance both before and after mitigation. This chapter addresses the other required topics identified above, as well as cumulative impacts and project alternatives.

5.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CEQA Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (Section 15126.2(b)). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR identified no significant and unavoidable project impacts or cumulative impacts.

5.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines require a discussion of significant irreversible environmental changes with project implementation, including uses of nonrenewable resources during the initial and continued phases of the project (Section 15126.2(c)). As described in Section 15126.2(c), use of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with the project.

According to Section 15126.2(c), a project would generally result in a significant irreversible impact if:

- The project would involve a large commitment of nonrenewable resources during initial and continued phase of the project;
- Primary and secondary impacts would generally commit future generations to similar uses;

- ❑ The project would involve uses in which irreversible damage could result from environmental accidents; or
- ❑ The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The Project consists of a program-level plan document to guide future parks and recreational facility planning and development. The proposed Parks Master Plan identifies a range of improvements to existing park and recreational facilities. No specific development is proposed as a part of the Master Plan. Future development accommodated by the proposed Project could result in improvements to existing parks and recreational facilities, but would not result in wasteful or inefficient use of energy. The proposed Parks Master Plan includes policies, actions and recommendations for a range of improvements to existing park and recreational facilities. Most of the improvements would be considered an upgrade or enhancement to an existing facility with addition of amenities, landscaping, or minor improvements, such as picnic tables and play areas that would not result in electrical or natural gas consumption. No new facilities or site-specific development are proposed as a part of the Parks Master Plan.

Future improvements to park lighting and renovation of existing buildings could result in energy demands. However, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources given the implementation of recommendations in the Parks Master Plan. The proposed Master Plan includes specific policies and that would be implemented that would ensure efficient use of energy. See section 4.11 regarding energy use and conservation. Thus, the proposed Plan would not commit future generations to uses that do not already exist. No other irreversible changes are expected to result from the adoption and implementation of the proposed amendments.

5.3 GROWTH-INDUCING IMPACTS

Remove obstacles to population growth (e.g., through the expansion of public services into an area that CEQA requires that any growth-inducing aspect of a project be discussed in an EIR. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. Projects that could remove obstacles to population growth (such as major public service expansion) must also be considered in this discussion. According to CEQA, it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

According to the CEQA Guidelines, a project would have the potential to induce growth if it would:

- Extend infrastructure or services to an area that does not currently receive these services), or through the provision of new access to an area, or a change in restrictive zoning or land use designation; or

- Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

As discussed in Section 4.13 of this EIR, the Project does not include new residential or commercial development that would increase population or generate employment opportunities. The Project consists of a program-level plan document to guide future parks and recreational facility planning and development. The proposed Parks Master Plan identifies a range of projects that would result in improvements to existing park and recreational facilities. Most of the improvements would be considered an upgrade or enhancement to an existing facility with addition of amenities, landscaping or minor improvements. The Project would not include off-site improvements or extension of water or sewer into undeveloped areas, and thus, the Project would not remove obstacles to development and population growth. Therefore, the Project would not directly or indirectly induce substantial population or economic growth.

5.4 CUMULATIVE IMPACTS

5.4.1 State CEQA Requirements

The CEQA Guidelines Section 15130(a) requires that an EIR discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” As defined in Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. As defined in section 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider the effect significant.

CEQA requires an evaluation of cumulative impacts when they are significant. When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Furthermore, according to the California State CEQA Guidelines section 15130 (a)(1), there is no need to evaluate cumulative impacts to which the project does not contribute.

An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant when, for example, a project funds its fair share of a mitigation measure designed to alleviate the cumulative impact. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide detail as great as that provided for the impacts

that are attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified project contributes.

CEQA Section 21094(e)(1) states that if a lead agency determines that a cumulative effect has been adequately addressed in a prior environmental impact report, that cumulative effect is not required to be examined in a later EIR. The section further indicates that cumulative effects are adequately addressed if the cumulative effect has been mitigated or avoided as a result of the prior EIR and adopted findings or can be mitigated or avoided by site-specific revisions, imposition of conditions or other means in connection with the approval of the later project (subsection (e)(4)). If a cumulative impact was addressed adequately in a prior EIR for a general plan, and the project is consistent with that plan or action, then an EIR for such a project need not further analyze that cumulative impact, as provided in Section 15183(j). Therefore, future projects that are determined to be consistent with the General Plan after it is adopted may rely on this analysis to streamline their environmental review.

5.4.2 Cumulative Analysis

Cumulative Growth and Projects

Discussion of cumulative impacts may consider either a list of past, present, and probable future projects producing cumulative impacts or a summary of growth projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts, such as those contained in a General Plan. The Santa Cruz City Council adopted an updated *General Plan 2030* in 2012 and certified the accompanying EIR. The analyses in the EIR provide an assessment of cumulative impacts within the City with projected growth in the next 20 years. The buildout estimated for the General Plan EIR assumed the following additional development in the downtown: 299 residential units, and approximately 38,900 and 4,500 square feet of commercial and office space, respectively.

The PARKS, RECREATION AND OPEN SPACE chapter of the *General Plan 2030* includes goals, policies and actions that address parks and recreational facilities, open space, trails and recreation programs. General Plan Action PR1.1.2 calls for developing and maintaining a citywide Parks Master Plan that sets service standards and strategic goals for the development and maintenance of parks and related facilities. As indicated in Chapter 3.0, Project Description, the Parks Master Plan was prepared to be consistent with and implement the General Plan policies and actions. See Section 4.13, Land Use, regarding consistency of the Parks Master Plan with the *General Plan 2030*.

The proposed Parks Master Plan is consistent with the General Plan and was prepared to help implement General Plan parks and recreation policies. Because CEQA discourages “repetitive discussions of the same issues” (CEQA Guidelines section 15152(b)), and because the Project is consistent with the City’s *General Plan 2030*, the City has determined the Project meets the provisions of CEQA section 21083.3(b) and State CEQA Guidelines section 15183 and, therefore,

the City's *General Plan 2030* EIR has adequately addressed cumulative impacts for all topics. The General Plan EIR identified four significant cumulative impacts related to population and housing, noise, traffic, and water supply. The proposed Project does not include residential uses and would not contribute to cumulative population impacts. There are no Project locations in the area of the City where potential cumulative noise impacts were identified, and thus, the Project would not contribute to this cumulative impact. Improvements to parks and recreational facilities recommended in the Parks Master Plan could contribute to significant cumulative traffic and water impacts.

The General Plan 2030 EIR cumulative analysis is used for this EIR. The cumulative scenario includes General Plan buildout and University of California Santa Cruz (UCSC) growth as analyzed in the General Plan EIR. In addition, the following plans are included in the cumulative analysis in this EIR because they were not prepared at the time of preparation of the General Plan EIR or considered in the General Plan 2030 EIR.

- ❑ ***Downtown Plan Amendments.*** In 2017, the City Council approved a series of amendments to the Downtown Plan, General Plan, Local Coastal Program (LCP), and zoning code. The amendments primarily modified development standards in the Downtown Plan area with the main change being extension of the additional height zones. As a result, the EIR evaluated impacts associated with the Plan's indirect effects of accommodating additional development and growth in the downtown area, estimated as approximately 711 new residential units and approximately 15,000 square feet of additional commercial space.
- ❑ ***Wharf Master Plan.*** The Wharf Master Plan was prepared in 2014, and preparation of an EIR on the Plan is currently underway. City staff estimates that the Plan and EIR will be considered by the City Council in 2020. The Wharf Master Plan includes policies, actions and recommendations for potential expansion of the Wharf, new facilities and circulation and parking improvements. The Plan includes design standards that address building design elements, including height, materials, design, windows, roofs and displays. The Master Plan recommends the following new facilities: expansion of the Wharf to create a new promenade on the east side of the Wharf (East Promenade) for public pedestrian and bicycle access; a new walkway on the west side of the Wharf (Westside Walkway); three new public use buildings, totaling approximately 15,000 square feet for public uses; and two new accessible boat landings. The Master Plan also considers remodeling and intensified use of existing structures. Recommended structural improvements include installation of new and replacement Wharf support piles, lateral bracing, and roadway and utility improvements, including improvements to the Wharf's pavement, drainage system, and trash collection system.

Circulation and parking improvements are proposed to more efficiently utilize the existing circulation area and encourage alternative transportation, including relocation of the Wharf entrance further south onto the Wharf. Other improvements include restriping of existing parking

areas that would result in approximately 45-65 additional parking spaces, widening existing sidewalks for improved pedestrian access, and provision for up to 150 bicycle parking spaces.

- ❑ **West Cliff Drive Adaptation Plan.** The City is currently preparing a plan for West Cliff Drive that will assess climate threats along 2.5 miles of West Cliff Drive, including coastal bluff erosion, sea level rise, and other land use issues. A draft plan is being prepared and is expected to be completed by the end of 2021. The plan will include a base assessment and an inventory of current conditions, as well as a cost-benefit assessment, funding strategies, conceptual design of alternative options, and a final plan with action tasks and policies.

It is also noted that the projects listed below are currently proposed in City-owned parks, open space, and recreational facilities. As noted, in Chapter 4, the City started the process of developing conceptual site plan options for Jessie Street Marsh in 2017 to address community desires and concerns and to help facilitate community discussion regarding trail access, native revegetation, and measures to expand/enhance the existing wetland, in keeping with the provisions of the Jessie Street Marsh Management Plan. However, at this time, the conceptual options have not been finalized, and a specific design has not been selected or adopted by the City.

- Audrey Stanley Grove amphitheater: Construction of a permanent restroom, dressing room and small concession area adjacent to the existing amphitheater; an application is pending before the City Planning and Community Development Department. The project would be generally located within the area occupied by existing trailers.
- Pogonip Homeless Garden Project: Construction of four buildings and a parking lot with a farm and garden area. CEQA environmental review was included in the Pogonip Master Plan EIR, and an EIR Addendum was prepared on minor changes to the project. Construction timing is not known.

The City currently leases the Lower Main Meadow to the Homeless Garden Project. The City and Homeless Garden Project have been working together to locate their farm in the Lower Main Meadow for many years. The Homeless Garden Project plans to offer workforce training, transitional employment, and support services for homeless persons at the farm. The future Pogonip Farm will include a 1,460-square foot administration building, 1,090-square foot pole barn/equipment storage building, two 1,440 square foot greenhouses, and nine acres of cultivated land.

In April 2019, initial soils testing results documented low levels of contamination. The City submitted the preliminary soils investigation report to the County of Santa Cruz Environmental Health Division for review and consultation, and has since enrolled in the County's Voluntary Clean-up Program. The City has been awarded funding through a California Department of Toxic Substances Control (DTSC) for environmental assessment services under the Targeted Site Investigation (TSI) Program. The assessment of the Lower Main Meadow is anticipated to be

completed by May 2020 and will consider potential contamination issues that may affect the Homeless Garden Project. In November 2018, the City notified the Homeless Garden Project that the use of the property for a farm must be put on hold until the property is determined to be safe for the intended use.

The following section provides evaluation of the Project's contribution identified significant traffic and public service-water cumulative impacts and also includes potential cumulative impacts related to aesthetics, biological resources and cultural (historical) resources as a result of implementation of the Downtown Plan and Wharf Master Plan. The City of Santa Cruz *General Plan 2030* and the General Plan EIR are available for review at the City of Santa Cruz Planning and Community Development Department (located at 809 Center Street, Room 101, Santa Cruz, California) during business hours: Monday through Thursday, 7:30 AM to 12 PM and 1 PM to 5 PM. The General Plan EIR is also available online on the City's website at:

<http://www.cityofsantacruz.com/Home/Components/BusinessDirectory/BusinessDirectory/102/1775>.

Although potential hazardous materials issues have been identified at Pogonip regarding soil contamination in relation to the Homeless Garden Project, there are no other Parks Master Plan recommended improvements or uses that involve sites with hazardous materials issues. Therefore, the Project would not contribute to potential cumulative impacts related to hazardous and hazardous materials and no further discussion is warranted.

Cumulative Impact Analysis

Aesthetics. The geographic area for consideration of cumulative impacts would be areas from which Project park and recreational facility locations may be visible. The proposed Project would not result in impacts to scenic views or scenic resources, and no further review of these topics is needed. Cumulative growth forecast in the *General Plan 2030*, the *Downtown Plan* and the Wharf Master Plan are generally within existing developed areas and not within the same viewshed as the park facilities. While new structures could be constructed as a result of the Downtown Plan and proposed Wharf Master Plan, there are no other structural improvements recommended for parks or recreational facilities that would occur in or near the downtown or Wharf areas that could result in potential cumulative impacts. The proposed Parks Master Plan includes recommendations for seasonal lighting at the Main Beach volleyball courts and new lighting could be installed per recommendations of the Wharf Master Plan. However, both areas are within developed areas where Wharf and street lighting are present, and both the proposed Parks Master Plan and Wharf Master plan include design guidelines to prevent lighting from impacting adjacent properties or natural areas. Therefore, no significant cumulative impacts would occur related to light and glare.

Biological Resources. The geographic area for consideration of cumulative impacts would be the Project areas that also include areas adjacent to the San Lorenzo River where new development under the Downtown Plan could occur or at the Wharf. There are no recommendations for

facilities that are located in these areas, except for the exploration of seasonal lighting at Main Beach. However, no significant cumulative impacts related to lighting have been identified as discussed above.

Cultural Resources. Recommendations in the Parks Master Plan that could affect cultural-historical resources include Potential rehabilitation of the Pogonip Clubhouse, which would be in accordance with measures identified in the Pogonip Master Plan and Master Plan. Potential impacts were found to be less than significant (City of Santa Cruz, April 2012, DEIR volume). The only other potential cumulative impact to historical resources is related to future improvements at the Santa Cruz Wharf. Although the Wharf Master Plan has not yet been adopted and environmental review is underway, the Plan identifies improvements to the Wharf, which is a historic resource due to listing in the City’s Historic Building Survey and eligibility for listing in the California Register of Historical Resources (CRHR). Historical review of the Wharf Master Plan found that the proposed improvements would not result in a significant adverse effect to the historical significance of the Wharf (Architecture + History. January 20, 2016). Therefore, the cumulative projects would not result in a significant impact to historical resources.

Public Services and Utilities. The geographic area for consideration of cumulative impacts would be the City of Santa Cruz service area in which the Project site is located.

Fire and Police Protection and Solid Waste. The City’s Fire and Police Departments and the City’s Resource Recovery Center (landfill) serve City residents. No significant cumulative impacts have been identified with buildout under the City’s General Plan and other cumulative growth, i.e. UCSC growth, and no new or expanded police or solid waste facilities are needed to serve cumulative growth, including the proposed Project.

Cumulative development and growth in the downtown area could result in the need for expanded fire facilities. According to the City’s Fire Department, the existing downtown fire station is inadequate in terms of space and equipment to meet existing needs, which would be further impacted by development and growth that would be accommodated by the proposed Project and other cumulative development. Should expansion be proposed, it is likely that expanded or new fire facilities would be within developed downtown and/or eastside locations. Expansion or new construction would be considered infill development on sites surrounded by development. However, existing and future growth may require new or physically altered fire protection facilities, but locations for expansion or construction are within developed areas and are not expected to result in significant physical impacts. Therefore, no significant cumulative impact related to fire protection services is anticipated (City of Santa Cruz, October 2017).

Schools. Potential cumulative development that could affect school enrollment includes development and growth within the City and surrounding areas as well as the proposed Project. The General Plan 2030 EIR concluded that this is a potentially significant cumulative impact. With required payment of school impact fees to fund necessary facility expansion and/or additions, in conjunction with use of the former Natural Bridges Elementary School, the impact would be

mitigated to a less-than-significant level (City of Santa Cruz, April 2012, DEIR volume). The proposed Parks Master Plan would not directly or indirectly result in additional residential development that would generate school-aged students. Therefore, the Project would not contribute to cumulative school impacts.

Water Supply. The geographical area for the analysis of cumulative water supply impacts includes the area served by the City's Water Department. Background on the existing and projected future demand and supplies is provided in Section 4.11.1.1, Water Supply – Service. As indicated, the 2015 UWMP predicts water supply shortfalls by the year 2035 of approximately 40 MGY in normal rainfall years, 528 MGY during a single dry year, and 1,639 MGY in multiple dry year periods even though demand is forecast to decrease. Without augmented water supplies, cumulative future water demand during dry periods is considered a potentially significant cumulative impact on water supplies.

As discussed in Section 4.11, the City continues to administer its water conservation program, has completed a Conservation Master Plan, and is implementing a water augmentation plan. The City has defined water supply augmentation strategies that are being studied in order to provide reliable production during drought shortages between 2020 and 2035 to address potential drought shortages. The plan includes the pursuit of the following portfolio of options: continued and enhanced conservation programs; passive recharge of regional aquifers; active recharge of regional aquifers; and a potable supply using advanced treated recycled wastewater or desalinated water (if recycled water did not meet City needs). Supply volumes for the other augmentation elements have not yet been defined, and specific projects have not been selected or constructed, as these prospective sources are still under evaluation. Thus, the long-term provision of augmented water supplies is under development, but uncertain.

The Project consists of a program-level plan document to guide future parks and recreational facility planning and development. The proposed Parks Master Plan includes policies, actions and recommendations for a range of improvements to existing park and recreational facilities. Most of the improvements would be considered an upgrade or enhancement to an existing facility with addition of amenities, landscaping, or minor improvements. No new facilities or site-specific development are proposed as a part of the Parks Master Plan. Feasibility studies would be conducted for new parks and facilities before site plans are developed, and future proposed improvements and projects will be subject to additional environmental analysis once project-level plans are developed. As discussed in Section 4.11, the Parks Master Plan does not include recommendations for major new uses or facilities that would result in a substantial increase in water demand. While there may be some increased use in potable water demand associated with citywide population and visitor growth, there would not be substantial water usage increases. Furthermore, the proposed Parks Master Plan includes policies, actions and recommendations that call for sustainable landscaping and maintenance practices to conserve water, conduct water audits and replace of irrigated turf in some locations. The Master Plan also supports other water conservation strategies, including the use of recycled and captured stormwater. Taken together, these measures would offset any minimal increased demand resulting from future improvements

at existing parks. Improvements implemented pursuant to the Parks Master Plan would be subject to City requirements for installation of water conserving fixtures and landscaping in accordance with City Municipal Code and building requirements. Therefore, the project's incremental contribution to a significant cumulative water supply impact would not be cumulatively considerable.

Traffic and Transportation. The geographic area for consideration of cumulative impacts would be those areas of the street network to which the proposed Project would contribute trips. Cumulative traffic impacts were analyzed in the *General Plan 2030* EIR based on estimated buildout accommodated by the General Plan, a number of approved and reasonably foreseeable projects, and long-range growth anticipated for UCSC.

The General Plan 2030 EIR found that cumulative development and growth would generate traffic that would result in unacceptable levels of service at 26 intersections, all of which could be improved to acceptable levels or improved operations (i.e., delays reduced to existing levels), except at 11 intersections, including five along state routes. Improvements would reduce delays below the level generated by cumulative traffic, but LOS would not be improved to meet City or Caltrans' standards at 11 intersections. Similarly, cumulative traffic along state highways would contribute to existing and future unacceptable levels of service. Therefore, the cumulative traffic would result in significant impacts at 11 intersections and along Highways 1 and 17. Funding availability for major facility improvements and expansion of transit service will likely remain constrained into the foreseeable future. Because implementation of recommended improvements and alternative transportation facilities cannot be assured, the General Plan EIR concluded that traffic impacts at some identified intersections and along highway segments would remain significant under cumulative conditions (City of Santa Cruz, April 2012).

Some parks and recreational facilities are located near cumulatively impacted intersections identified in the General Plan EIR, primarily along Highway 1-Mission Street. Improvements have been identified for the Highway 1/Highway 9, Chestnut/Mission, Laurel/Mission Bay/Mission, and Swift/Mission intersections in the City's Traffic Impact Fee (TIF) program. There are no recommended improvements at Project sites near the Wharf or downtown area that would contribute to cumulative traffic impacts in this area. Based on the General Plan 2030 EIR cumulative analyses, the proposed Project would potentially contribute to significant cumulative traffic impacts on Mission Street. However, recommendations in the Parks Master Plan would mostly result in minor upgrades or improvements to existing facilities that would not result in substantial generation of traffic. Most of the recommendations in the Parks Master Plan would not result in new structural development that would generate trips. Potential expanded use at the Audrey Stanley Grove amphitheater at DeLaveaga Park and San Lorenzo Park is expected to occur on weekends and/or during the day outside of weekday AM and PM peak hours for traffic and, thus, would not result in significant traffic increases during the peak hours that would conflict with a program, plan, ordinance, or policy addressing the circulation system. Similarly, potential small parking lots at Lower DeLaveaga Park, Moore Creek Preserve, and Pogonip Open Space are identified for consideration in the Parks Master Plan, but these parking areas would be relatively

small and would not generate a substantial increase in peak hour traffic or conflict with plans or policies related to circulation. Therefore, the project’s incremental contribution to a significant cumulative traffic impact as evaluated in the General Plan 2030 EIR would not be cumulatively considerable.

As discussed in section 4.10, the pursuant to changes in the State CEQA Guidelines, effective in 2019, a project’s effect on automobile delay shall not constitute a significant environmental impact. The City has not yet adopted a VMT standard. However, the City’s existing VMT is over 15 percent lower than the regional per capita VMT. Technical guidelines published by the California Office of Planning and Research indicate a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact (California Office of Planning and Research, December 2018). Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa (Ibid.). Therefore, the Project’s contribution to cumulative transportation impacts would not be cumulatively considerable.

5.5 PROJECT ALTERNATIVES

According to CEQA Guidelines (Section 15126.6), an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The guidelines further require that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project, or reducing them to a level of insignificance even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternatives analysis also should identify any significant effects that may result from a given alternative. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The lead agency is responsible for selecting a range of potentially feasible project alternatives for examination, and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a “rule of reason” that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Alternatives in an EIR must be “potentially feasible.” Agency decision makers ultimately decide what is “actually feasible.”

“Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines, section 15364). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or already owns the alternative site). None of these factors establishes a fixed limit on the scope of reasonable alternatives. The concept of feasibility also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, feasibility under CEQA encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

5.5.1 Summary of Potentially Significant Impacts and Project Objectives

Potentially Significant Project Impacts

This EIR identified the following potentially significant impacts that can be reduced to a less-than-significant level with implementation of mitigation measures identified in this EIR.

- ❑ **Impact BIO-4: Wildlife Breeding – Nesting Birds.** Implementation of the Parks Master Plan and future implementation of recommended improvements could result in indirect impacts to nesting birds if any are occurring within or near future construction areas.
- ❑ **Impact GEO-2: Soils and Erosion.** The proposed Project would not directly result in substantial erosion or loss of topsoil, but may result in indirect erosion impacts related to future trail development supported by the Parks Master Plan.
- ❑ **Impact HYD-1: Water Quality.** Future development accommodated by the proposed *Parks Master Plan 2030* could result in minor increases in stormwater runoff, but would not result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, except for potential erosion due to construction.

Project Objectives

The following are the Project objectives as set forth in the *Parks Master Plan 2030* and in consultation with City staff.

1. Implement the *General Plan 2030*, by providing more detailed direction and recommendations for the future development and maintenance of parks, open spaces, beaches, and recreational facilities in Santa Cruz.

2. Identify and assess the City's various existing parks, open space, and facility assets and community needs through a comprehensive public outreach effort.
3. Create a feasible vision and goals that prioritize community needs and desires for park and recreational facility expansion and improvements that creates a quality park system.
4. Provide policies and actions to support community goals and in response to needs of all user groups.
5. Develop a plan that ensures long-term stewardship, environmental protection, and sustainability of City parks.
6. Construct an implementable action plan to accomplish community goals, while establishing phasing and funding opportunities and allowing for flexibility and updates to reflect changing and emerging conditions.
7. Maintain and enhance a park system that connects the surrounding greenbelts to the Pacific Ocean, preserves and protects the City's natural heritage, enhances its cultural and recreational environments, and provides a diversity of recreational experiences that enrich lives and support a healthy community.

5.5.2 Alternatives Considered

Section 15126.6(c) of the CEQA Guidelines indicates that the range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR also should identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.

The EIR provides a program-level analysis of the *Parks Master Plan 2030*, which is a guidance document that assesses existing conditions and community needs, and guides the short- and long-term planning of parks, recreational facilities, beaches, and open space-greenbelt lands. The Parks Master Plan includes goals, policies and actions for the provision of parks and recreational services and identifies recommendations for improvements at existing facilities and potential expansion of existing park and recreational facilities and uses and potential addition of new parks, facilities and recreational uses. Most of the Parks Master Plan recommendations are improvements to existing parks and recreational facilities that would be considered an upgrade or enhancement to an existing facility with addition of amenities, landscaping or minor improvements. Facility recommendations that may result in new or expanded development include potential new trails, three areas of potential new parking, development of a small amphitheater at Harvey West Park, construction of restrooms and small buildings, and renovation of existing structures. Potential new recreational uses and/or facilities recommended in the Parks Master Plan or recommended to be

considered include additional recreational facilities, such as athletic fields, bike parks and mountain bike facilities, community gardens, off-leash dog use areas, a drone course, pickleball courts, playgrounds, pickleball facilities, and tennis courts.

In most cases, specific site locations have not been identified for new uses, although some existing parks are identified for some facilities (e.g., community gardens, dog park facilities, playgrounds, and pickleball facilities). New and/or expanded trails are recommended at Arroyo Seco, DeLaveaga Park, Jessie Street Marsh, Moore Creek Preserve and Pogonip Open Space. However, the Parks Master Plan does not include specific proposals or details regarding the location, design, size or siting of specific recommended improvements, development or potential new uses. Although no project-specific site plans are proposed as a part of the Parks Master Plan for expanded or new facilities, and the Plan would not directly result in development, the EIR has evaluated potential indirect impacts arising from future implementation and construction of recommended improvements. The only identified significant impacts are potential indirect impacts arising from future development, which are related to construction (impacts to nesting birds and erosion) and potential development of a drone course (impacts to nesting birds).

In considering a range of alternatives, the City considered reducing the scope of the Parks Master Plan in order to eliminate potential expansion or development of new recreational facilities or uses. The City considered an alternative in which new or expanded recreational uses identified in the Master Plan would be eliminated. As identified in Chapter 3, Project Description, potential new or expanded uses include: athletic fields, mountain bike facilities, community gardens, off-leash dog facilities, a drone course, playgrounds, pickleball facility, tennis courts, and trails. In accordance with provisions of the Parks Master Plan, a feasibility study would be conducted to study potential locations and options for an athletic field. Similarly, Master Plan actions call for evaluation of new trails through a public review process to determine if they are appropriate for a specific location. Therefore, these uses would require evaluation of specific locations prior to any action being taken. Furthermore, elimination of these uses would not achieve basic Project objectives to be responsive to all user groups and provides a diversity of recreational experiences. Therefore, removal of these potential uses and studies was eliminated from further consideration.

The other identified new or potential facilities or recommended improvements generally are small in size and address a range of recreational uses identified for the community, the elimination of which would not meet basic Project objectives. Furthermore, except for a potential drone course, the other potential uses would not contribute to identify significant impacts, and thus, elimination of these potential uses would not avoid or substantially lessen an identified significant impact. Due to potential biological impacts related to use of a recreational drone facility, the City determined that this use could be considered for elimination. The City also considered some reduction in potential new trails to lessen significant biological resource and erosion impacts, which is addressed in Alternative 1.

The City also considered modification of policies and actions in the Parks Master Plan to further the City's overall objective of developing a plan that ensures long-term stewardship,

environmental protection and sustainability of City parks. In this regard, the City identified an alternative to revise or add policies and actions to better address the potentially significant impacts identified in the EIR.

Based on the above discussion, the following section evaluates the following alternatives:

- No Project – Required by CEQA
- Alternative 1 – Reduced Project
- Alternative 2 – Modified Project

Each alternative is described and analyzed below, and the ability to meet project objectives also is addressed.

No Project Alternative

Section 15126.6(e) of the State CEQA Guidelines requires that the impacts of a “no project” alternative be evaluated in comparison to the proposed project. Section 15126(e) also requires that the No Project Alternative discuss the existing conditions that were in effect at the time the Notice of Preparation was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Project Description. Under the No Project Alternative, the Parks Master Plan would not be adopted. However, improvements, expansion or additions to existing parks and facilities could occur without a City-adopted Parks Master Plan. Such improvements would be subject to recommendations in adopted Park Master Plans at those sites where plans exist.

Impacts. Under the No Project Alternative, none of the Project impacts identified in this EIR would occur. However, since improvements to park facilities could occur without the Plan, some level of improvement and/or expansion at park and recreational facilities would be reasonably expected to occur over the next 25 years.

Ability to Meet Project Objectives. The No Project Alternative would not meet any Project objectives.

Reduced Project Alternative

Project Description. Under this alternative, consideration of a potential future recreational drone course would be eliminated. The Parks Master Plan calls for consideration of the establishment of a drone course (Goal III-Policy G, Action 1j), but the Master Plan does not propose a location or provide a description of facilities that might be considered. Discussions with City staff indicate that this recommendation stems from an interest to provide a dedicated area and regulate this type of use. This type of facility would be for recreational use of small drones to provide a course for

operating these devices, which are small (approximately one foot in length) and do not produce significant sounds, except for a low whirring sound. Currently there are no City regulations regarding use of drones in the City.

This alternative also considers a reduction in new trails. Goal II-Policy F calls for enhancement of trail programs, trails, and infrastructure. Action 1 seeks to “develop, improve, and enhance trails to provide for a wide range of uses.” Actions 1b and 1j call for expansion of the trail network and connections, including creation of mountain bike spurs from multi-use trails. However, Action 1a calls for evaluation of new trail uses through a public process to determine if they are appropriate for a specific location. Goal VI-Policy A, Action 6 calls for connecting major parks throughout the City with smaller loop options and spur trails that connect to the bike and pedestrian system through the City and to the regional network. Furthermore, Goal III-Policy F, Action 1a calls for evaluation of new trail uses through a public process to determine if they are appropriate for a specific open space area, which would include collection of usage data on existing trails and a study of impacts to wildlife and habitat to inform the decision-making process. The Parks Master Plan calls for considering opportunities for new and/or expanded trails and trail connections within the following existing open space areas: DeLaveaga Park-Wilderness Area, Pogonip, and Moore Creek Preserve, as well as at Jessie Street Marsh and Arroyo Seco Canyon.

This alternative would modify Master Plan recommendations to not consider new trails at DeLaveaga and Pogonip that are not already included in existing adopted master plans for these areas. It is important to note, however, that the recommendation for Pogonip was only to perform an assessment to help determine if new trails are appropriate. Nonetheless, with revisions to recommendations, there could be some reduction in potential future new trails in the City’s two primary open space areas.

Impacts. Under the Reduced Project Alternative, potential indirect impacts to biological resources, and in particular nesting birds, resulting from development and use of a recreational drone course would be eliminated. To the extent that development of a drone course would result in grading, potential indirect impacts related to generation of erosion and degradation of erosion also would be eliminated with elimination of this use. In the absence of other City regulations to control use and operations of recreational drones, there could be use of these devices that could result in impacts to nesting birds similar to those identified in the EIR. A reduction in potential new trail construction also would help reduce and lessen significant impacts related to nesting birds, erosion and water quality, but would not eliminate the impacts as some trail and other facility improvements or development could continue to occur, and, therefore mitigation would be required as with the proposed Project.

Ability to Meet Project Objectives. The Reduced Project Alternative would meet all Project objectives, except three objectives would only be partially met. Objective #1 calls for implementation of the *General Plan 2030*, by providing more detailed direction and recommendations for the future development and maintenance of parks, open spaces, beaches, and recreational facilities in Santa Cruz. Goal PR4 calls for an integrated system of citywide and

regional trails, which would be partially met with a reduction in new trails. Similarly, the Parks Master Plan includes goals and policies to create a network of trails for recreational and commuter purposes. To this end, Objective #7 calls for maintenance and enhancement of a park system that connects the surrounding greenbelts to the Pacific Ocean, which may be partially impeded with a reduction of new trails. This alternative also would only partially meet Objective #4 in that it would not respond to the needs of all user groups.

Modified Project Alternative

Project Description. Under this alternative, the Parks Master Plan 2030 would be modified to expand policies and actions to address potential indirect impacts to nesting birds, erosion and water quality, potentially resulting from development or construction of facilities and improvements recommended in the Master Plan, particularly trails. The following policies and actions would be revised or expanded as follows:

- ❑ *Goal II-Policy B, Action 1j-REVISE:* Consider establishing a drone course only after further study that demonstrates use of the facility would not result in significant impacts to sensitive habitat areas and wildlife, including nesting birds.
- ❑ *Goal IV-Policy B, Action 2n-REVISE:* As part of the CEQA review process for new projects, evaluate and mitigate potential impacts to sensitive habitat (including special-status species and nesting birds) for site located within or adjacent to these areas.
- ❑ *Goal IV-Policy B, Action 2-NEW:* Implement site design and erosion control measures for new trails and other facilities in areas subject to high erosion hazards or adjacent to streams and wetland areas.

Impacts. Under the Modified Project Alternative, potentially significant indirect impacts related to nesting birds and erosion would be eliminated with revised and/or new Parks Master Plan actions. These actions address the potential impacts and require that future construction and/or development of recommended improvements be designed to avoid the identified biological and erosion-water quality impacts. Therefore, potentially significant impacts would be avoided with this alternative.

Ability to Meet Project Objectives. The Modified Project Alternative would meet all the Project objectives.

Environmentally Superior Alternative

According to CEQA Guidelines section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Furthermore, Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially

lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines in Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

In the present case, none of the alternatives, including the No Project Alternative would eliminate significant impacts. Table 5-1 on the next page presents a comparison of Project impacts between the proposed Project and the alternatives. Excluding the No Project Alternative, Alternative 2, Modified Project, is considered the environmentally superior alternative of the alternatives considered because it would avoid and/or reduce potentially significant impacts, while meeting Project objectives.

Table 5-1: Comparison of Impacts of Project Alternatives

Environmental Issue	PP	NP	ALT 1	ALT 2
AES-2: Scenic Resources	LS	LS -	LS	LS
AES-3: Visual Character	LS	LS-	LS	LS
AES-4: Light and Glare	LS	LS -	LS	LS
AIR-2: Project Emissions	LS	LS -	LS	LS
AIR-3: Sensitive Receptors	LS	LS -	LS	LS
GHG-1: GHG Emissions	LS	LS -	LS	LS
Air Quality 4.2-2: GHG Emissions	LS	LS -	LS -	LS -
BIO-1: Sensitive Habitats	LS	LS -	LS	LS
BIO-2: Wetland Habitat	LS	LS -	LS	LS
BIO3: Special Status Species	LS	LS -	LS	LS
BIO-1: Sensitive Habitats	LS	LS -	LS	LS
BIO-4: Nesting Birds	LSM	LS -	LSM-	LS
CUL-1: Historical Resources	LS	LS	LS	LS
CUL-2: Archaeological Resources	LS	LS-	LS	LS
CUL-3: Human Remains	LS	LS	LS	LS
CUL-4: Tribal Cultural Resources	LS	LS	LS	LS
GEO-1: Seismic Hazards	LS	LS	LS	LS
GEO-2: Erosion	LSM	LS-	LSM-	LS
GEO 3: Unstable Geologic Units	LS	LS	LS	LS
GEO-6: Paleontological Resources	LS	LS	LS	LS
GEO-6: Paleontological Resources	LS	LS	LS	LS
HAZ-2: Wildland Fire Hazard	LS	LS-	LS	LS
HYD-1: Water Quality	LSM	LS-	LSM-	LS
HYD-3: Drainage	LS	LS	LS	LS
NOISE-1: Noise Increases	LS	LS	LS	LS
PUB-1,2, 3: Public Services	LS	LS -	LS -	LS -
TRANS-1: Conflicts with Plans	LS	LS -	LS -	LS -
UTIL-1, 2, 3, 4, 5: Utilities	LS	LS -	LS -	LS -
New Significant Impacts		None	None	None
Notes:				
PP = Proposed Project NP = No Project ALT1 = Reduced Project ALT2 = Modified Project NI = No Impact LS = Less than significant impact S = Significant LSM = Less than significant with mitigation SU = Significant unavoidable impact + = Greater adverse impact than proposed project - = Lesser adverse impact than proposed project				

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