



212 Locust Street, Suite C, Santa Cruz, CA 95060 ♦ (831) 420-5200

June 27, 2022

Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting

RE: Graham Hill Water Treatment Plant Facility Improvements Project

To Interested Persons and Agencies:

The City of Santa Cruz (City) as the Lead Agency for the Graham Hill Water Treatment Plant (GHWTP) Facility Improvements Project (Proposed Project) has issued this Notice of Preparation (NOP) pursuant to the California Environmental Quality Act (CEQA) to notify interested persons and agencies that an Environmental Impact Report (EIR) for the Proposed Project will be prepared. The EIR will evaluate potential environmental impacts of the Proposed Project. The purpose of this NOP is to provide an opportunity for interested persons and agencies to comment on the scope and proposed content of the EIR.

The NOP provides information about the public review and comment period, proposed project location ([page 4](#)), purpose and need ([page 5](#)), project description ([page 7](#)), and probable environmental effects ([page 8](#)) of the Proposed Project, and is posted on the City's website at: <https://www.cityofsantacruz.com/government/city-departments/water/online-reports/environmental-documents>.

Written comments are requested from interested persons and agencies regarding the scope and evaluation of potential environmental issues associated with the Proposed Project. Written comments are due within 30 days of the receipt of this notice, as provided by state law. As such, a 30-day public review and scoping period is established from **June 27, 2022 to July 26, 2022**. Written comments may be submitted by postal mail or email. All comments should indicate a contact person, if applicable.

All written comments are requested to be received by 5:00 p.m. on July 26, 2022, and should be sent to the following address:

Jessica Martinez-McKinney, Associate Planner II
City of Santa Cruz Water Department
212 Locust Street, Suite C
Santa Cruz, CA 95060
Email: jmartinezmckinney@cityofsantacruz.com

Español • Este aviso contiene información importante sobre el proyecto que mejoras las instalaciones en la planta de tratamiento de agua de Graham Hill (Graham Hill Water Treatment Plant Facility Improvements Project). Para asistencia en Español, comuníquese con el Departamento de Agua de la Ciudad de Santa Cruz al (831) 420-5220 o 212 Locust Street, Suite D; Santa Cruz, CA 95060.

Scoping Meeting

Two virtual (online) public scoping meetings (webinars) regarding the Proposed Project and EIR will be held. The webinars will each cover the same material. All interested persons and public agencies are invited to attend either (or both) of these meetings to learn more about the Proposed Project and the scope and proposed content of the EIR. This webinar will also include a brief overview of the CEQA environmental process and allow time for questions about the CEQA process and Proposed Project.

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| Date: | July 19, 2022 |
| Time: | 3:30-4:30 PM and 5:30-6:30 PM <i>Interested parties are invited to attend either (or both), the same content will be covered during each webinar.</i> |
| Zoom Links (same info for both meetings) | Zoom Link: https://us06web.zoom.us/j/87403686774 Webinar ID: 874 0368 6774 |
| Dial In/Code: | iPhone one-tap: US: +12532158782,,87403686774# or +13462487799,,87403686774# |
| Telephone (for higher quality, dial a number based on your current location): | Telephone: US: +1 253 215 8782 or +1 346 248 7799 or +1 720 707 2699 or +1 301 715 8592 or +1 312 626 6799 or +1 646 558 8656 or 877 853 5247 (Toll Free) or 888 788 0099 (Toll Free) or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free) |
| International numbers available: | https://us06web.zoom.us/u/kfhF7tgAp |

Agency Review and Comment

The EIR will be used in the planning and decision-making process by the City for approval of the Proposed Project. Other public agencies may need to use the EIR when considering permit issuance or other approvals for the Proposed Project, if any are required. Agencies are requested to respond with written comments regarding the proposed scope and content of the EIR as it relates to the agency's area of statutory responsibility and area of concern and expertise.

Comments received from State of California agencies should address (1) whether the agency will be a Responsible Agency or a Trustee Agency for the Proposed Project, and (2) if the agency is a Responsible Agency, any significant environmental issues and reasonable alternatives and mitigation measures that the Responsible Agency will need the City to have explored in the EIR analysis. We will also need the name, address, telephone number, and email address of the contact person for your agency.

Public agencies that may be expected to use the EIR in their decision-making processes (including ministerial actions) as Responsible or Trustee Agencies include but are not limited to:

- **State Water Resources Control Board, Division of Drinking Water.** Responsible Agency for issuing a Domestic Water Supply Permit Amendment.
- **State Water Resources Control Board, Division of Financial Assistance.** Responsible Agency if the Proposed Project obtains financing through the Drinking Water State Revolving Fund (SRF) Program. The EIR will include federal cross-cutting documentation if funding is pursued.
- **California Department of Fish and Wildlife (CDFW).** Trustee Agency for projects that may affect fish, wildlife, or their habitat and potentially a Responsible Agency for issuing a Lake and Streambed Alteration Agreement should construction activities result in fill of waters of the state if the Proposed Project impacts the San Lorenzo River due to storm drain modifications. State-listed endangered plant species that have potential to occur in the biological study area (BSA) include Santa Cruz wallflower, Santa Cruz tarplant, and San Francisco popcornflower. State-listed endangered animal species that have potential to occur in the BSA include coho salmon (in the San Lorenzo River). Potential for these endangered plant and animal species to occur in the BSA is considered low.
- **California Central Coast Regional Water Quality Control Board.** Responsible Agency for approval of a Clean Water Act Section 401 Water Quality Certification Permit in areas of impacts to waters or wetlands of the U.S., if the Proposed Project impacts the San Lorenzo River due to storm drain modifications. Also, the Regional Water Quality Control Board would oversee the City's Notice of Intent to Comply with the National Pollutant Discharge Elimination System Construction General Permit.
- **Monterey Bay Air Resources District.** Responsibility Agency for Authority to Construct and Permit to Operate for any new generators or other stationary sources.
- **County of Santa Cruz, Department of Public Works Sanitation Division.** Responsible Agency for issuing a Sewer Connection Permit and Wastewater Discharge permit if the Proposed Project connects to the County sewer main in Graham Hill Road. County of Santa Cruz would allow issue an encroachment permit for any work in Graham Hill Road.
- **Local Agency Formation Commission of Santa Cruz County.** Responsible Agency for LAFCO Extraterritorial Service authorization to receive a single service from County Sanitation if the Proposed Project connects to the County sewer main in Graham Hill Road.

In addition to state and local agencies, the CEQA document may also be used by the following federal agencies during their environmental review (under the National Environmental Policy Act [NEPA]) for consideration of permits on the Proposed Project:

- **U.S. Army Corps of Engineers.** Federal agency that may issue a Clean Water Act Section 404 permit should construction activities result in fill of waters of the U.S. (i.e., if the Proposed Project impacts the San Lorenzo River due to storm drain modifications).
- **U.S. Environmental Protection Agency.** Federal agency that may administer and provide funding for the Proposed Project through the Water Infrastructure Finance and Innovation Act

(WIFIA) loan program. The EIR will include federal cross-cutting documentation if funding is pursued.

- **U.S. Fish and Wildlife Service.** Federal agency that consults under Section 7 of the Endangered Species Act for projects that impact sensitive species of fish, wildlife, or their habitat. The City currently has two Incidental Take Permits for federally listed species that could cover the Proposed Project.
- **National Marine Fisheries Service.** Federal agency that consults under Section 7 of the Endangered Species Act for projects that impact U.S. fisheries. This may be required if the Proposed Project impacts the San Lorenzo River due to storm drain modifications.

Proposed Project Location

The Proposed Project would primarily be constructed at the City's existing GHWTP, located within Santa Cruz City limits. Additionally, the Proposed Project is anticipated to involve activities outside of the GHWTP for the purposes of temporary construction staging and potential utility and traffic safety improvements. These activities would occur in both City and County of Santa Cruz jurisdictions. The Proposed Project is anticipated to be located at four locations, which together constitute the Project site. The Proposed Project locations include:

- The approximately 14.88-acre primary Project site consisting of:
 - The approximately 12.4-acre City-owned GHWTP parcel located at 715 Graham Hill Road in Santa Cruz, CA 95060 on Assessor Parcel Number (APN): 060-141-05;
 - The approximately 0.18-acre, 550-linear-foot utility corridor between the GHWTP parcel and the San Lorenzo River via Ocean Street Extension and a 15-foot right-of-way on APN: 060-151-05;
 - Approximately 2.3-acres, 1,620 linear feet of the Graham Hill Road public right-of-way between just north of Mosswood Court and just south of Lyle Way;
- The approximately 5.14-acre staging area for the Proposed Project (Mt. Hermon Road Staging Area) located at the northern intersection of Graham Hill Road and Mt. Hermon Road, in Felton, CA at APN: 071-201-43; and
- The approximately 1.86-acre staging area for the Proposed Project (Ocean Street Extension Staging Area) located at 1941 Ocean Street Extension at APN: 008-031-16.
- The alternate sanitary sewer lateral improvement area from the southwest corner of the GHWTP parcel at Ocean Street Extension and along Ocean Street Extension for approximately 4,500 linear feet to the City Public Works Department maintained sanitary sewer connection at Graham Hill Road.

Figure 1 - Project Site and Vicinity shows the Proposed Project location and **Figure 2 - Existing GHWTP Site Layout** provides the existing facilities at the GHWTP.

The GHWTP is located in an area of single-family residential land uses on the northern, eastern, and southern perimeters. The western perimeter slopes down toward the San Lorenzo River and is an area of scattered residential dwellings. A narrow extension of the GHWTP extends from the otherwise rectangular parcel from the southwest corner down to Ocean Street Extension. This vegetated extension

is a corridor for several different types of utilities. The site is characterized by a mix of industrial development for the purpose of water treatment, open space and vegetation. The site is generally accessed from the south on Graham Hill Road via Ocean Street off of State Route 1 (locally referred to as Highway 1) but can also be accessed from the north on Graham Hill Road via Sims Road or Mount Hermon Road off of State Route 17 (locally referred to as Highway 17).

The Mt. Hermon Road Staging Area is located adjacent to heavily forested open space, as well as commercial and low/very low-density residential land uses. The Ocean Street Extension Staging Area is located adjacent to a crematorium and low/very low-density residential land uses, off of Ocean Street Extension.

Purpose and Need for the Proposed Project

The GHWTP is a conventional¹ water treatment plant that is a critical component of the drinking water system. It is the City's only surface water treatment plant and treats over 95% of the water served to its customers. The GHWTP treats local surface waters from multiple sources: the San Lorenzo River (at the Tait Diversion, Felton Diversion², and Tait Wells³), Majors Creek, Laguna Creek, Reggiardo Creek (by way of Laguna Creek Diversion), Liddell Spring, and Newell Creek (from the Loch Lomond Reservoir). The City selects its water source and blend for treatment based on multiple variables including demands, source water availability, and source water quality. These selections vary seasonally.

For drinking water utilities that rely on surface water sources, water treatment is a critically important public health protection function, and utilities must maintain treatment standards at all times without failure. The science of water treatment and treatment standards that utilities need to plan for and comply with continuously evolves. While surface water treatment plants are designed for standards at the time of construction and are often considered "state of the art," once constructed these water treatment plants can experience challenges to consistently meet changed regulations and/or changed source water conditions, as is the case for the GHWTP.

The GHWTP was originally constructed and placed into service in 1960. In the late 1960s the facility was expanded, and in the 1980s the mechanical, electrical and chemical equipment and control systems were modernized. The majority of the regulations impacting the operation and performance standards of the GHWTP began to emerge after those investments in 1989 with the passage of the Environmental Protection Agency Surface Water Treatment Rule, which was later augmented with a number of additional rules through the 2000s. During this time multiple major drinking water regulations affecting surface water treatment and distribution system water quality were developed and promulgated. Despite its original age, the GHWTP has adapted to operate and comply with these new regulations; however, a changing climate presents a new set of challenges that when combined

¹ Conventional water treatment is a method of treating raw water through a combination of coagulation, flocculation, sedimentation, filtration, and disinfection to achieve safe drinking water.

² At the time of the NOP release the City pumps water from the San Lorenzo River at the Felton Diversion to Loch Lomond Reservoir for storage before being treated at the GHWTP. Pending approval by the State Water Board the City may in the future have the flexibility to divert directly from San Lorenzo River from the Felton Diversion to the GHWTP under the Santa Cruz Water Rights Project.

³ The Tait wells refers to three groundwater wells under the direct influence of surface water near the Tait Diversion.

with the GHWTP's aging infrastructure and treatment processes, requires a more comprehensive upgrade. Specifically, the City expects that future source water quality could become more impaired, while standards become more stringent. Future source water conditions could be impacted by the City's increased reliance on winter streamflows, rainfall patterns that involve more intense rain events, increases in wildfires, and more frequent droughts that all impact both how much water is available for treatment and the treatability of source water, as well as increases in contaminants of emerging concerns.

The Proposed Project is needed to provide the community with a resilient surface water treatment plant that will meet the regulatory and climate change challenges of the 21st century. The Proposed Project includes both upgrades to address aging infrastructure such as buildings and treatment basins that do not meet modern seismic standards and the water treatment process to provide reliable and efficient performance to meet existing and reasonably foreseeable regulations. The upgraded water treatment process will include the flexibility to adapt the treatment process to meet a wide range of potential future regulations and future source water quality conditions.

Existing GHWTP Facilities

The GHWTP has a rated capacity of 24 million gallons per day (mgd), and since 2012 maximum daily demands have typically ranged from approximately 9 to 12 mgd. The existing GHWTP has an entrance access road off of Graham Hill Road with a security gate; internal access roads; operations building; filtration basins and filter gallery building; emergency back-up generator; electrical building, water quality laboratory, multi-use trailers and outbuildings for equipment/supply storage; three water treatment trains composed of carbon contact basins and flocculation/sedimentation basins; two flash mixing units; chemical storage facilities and chemical feed systems; concrete tanks for wash water, solids storage, reclaimed water and filtered water; lamella plate settler clarification system; pump stations; air compressors; pipelines, storm drains, and electrical systems; "heating, ventilation and air conditioning" (HVAC), "supervisory control and data acquisition" (SCADA) infrastructure, and "programmable logic controller" (PLC) units; and perimeter fencing. Prominent existing site features are labeled on **Figure 2**.

Previous and Current GHWTP Improvements

The GHWTP has undergone several improvements since its commissioning. Most notably, the GHWTP was expanded in 1968 with the addition of a third sedimentation basin and two additional filters. The GHWTP was then modernized in 1986 with the addition of flocculators and tube settlers and new chemical handling equipment. Since that time, investments into the GHWTP have focused on upgrades to the filters, addition of a lamella clarifier, in-kind repairs and replacements, seismic upgrades to the filter basins, and other minor improvements. Recent operational maintenance includes replacement of the tube settlers and the flocculators. Additionally, the replacement of three of the four on-site concrete tanks is underway and is scheduled for completion in Fall 2024, in advance of the Proposed Project (refer to **Figure 2**, which shows the Concrete Tanks and Pad [Under Construction]).⁴

While these investments have enabled GHWTP to adapt to changing source water conditions and regulatory treatment standards, due to the age and characteristics of the GHWTP infrastructure, additional upgrades and modernization are necessary to facilitate the GHWTP's ability to efficiently

⁴ The Graham Hill Water Treatment Plan Concrete Tanks Replacement Project is scheduled for completion in Fall 2024, [Graham Hill Water Treatment Plant Concrete Tanks Replacement Project](#).

adapt to future regulatory requirements, to meet water supply needs, and to account for future source water conditions.

Description of the Project

The Proposed Project consists of improvements at the GHWTP to address aging infrastructure and to provide for efficiently and reliably meeting future water quality objectives and water supply needs. At the time of this NOP the Proposed Project is still at a conceptual level of design, which includes a wide range of technical studies, evaluations, and inspections to define the placement and scope of the Proposed Project improvements. As the design process progresses the Proposed Project buildings and facilities will be sized and configured within the GHWTP site appropriately, based on the information collected during the early design phase and as informed by comments received during scoping.

The Proposed Project includes the following:

- **New Water Treatment and Related Processes.** New water treatment and related processes would rehabilitate, replace or augment the existing treatment systems at the GHWTP. The proposed treatment processes would allow the City to reliably and efficiently meet existing and reasonably foreseeable regulations even with source water that is more difficult to treat as described in the Purpose and Need section. The Proposed Project would include solids dewatering to allow for more efficient separation and disposal of solids that are removed from the raw water during the treatment process. Upgrades to the chemical feed systems would also be included as well as a replacement washwater supply tank, a new ozone contactor, pre-treatment processes, granular activated carbon contactors, and recycled water clarifiers. Space would also be reserved for a UV disinfection system and other additional treatment processes, if needed in the future. The design capacity of the Proposed Project would be approximately 18 mgd (net), a decrease from the 24 mgd capacity of the existing treatment plant.
- **New and Upgraded Buildings.** The Proposed Project would include new and upgraded buildings including a new administration building and/or operations building, new maintenance building, HVAC improvements, replacement or upgrade of the filter gallery building, and new ozone, solids dewatering, and chemical storage facilities.
- **Infrastructure and Site Improvements.** The Proposed Project would include infrastructure and site improvements including piping and storm water management improvements; electrical, and SCADA improvements; vehicular access improvements; landscaping improvements; and may include fencing and site security.
- **Removal of Existing Facilities.** The Proposed Project would include demolition of some existing buildings, water treatment facilities (e.g. sedimentation basins), and infrastructure, as needed to address facilities beyond their useful life or to accommodate new facilities.

Figure 3 - Proposed Project Development Areas provides a conceptual illustration of the locations in the Proposed Project that are being considered for development. The areas shown in the *Known Development Envelope* would be prioritized for development and permanent facilities. The *Optional Development Envelope – Low Priority* is the area that could be developed but that would be less desirable because of location, topography, or other factors. Since the GHWTP is a geographically constrained site, the *Optional Development Envelope – Low Priority* portion of the Proposed Project is being retained in the event that the *Known Development Envelope* is insufficient in accommodating

the necessary improvements. Specific activities, buildings, or facilities, if any, that would be placed in the *Optional Development Envelope - Low Priority Area* are not defined or known at this time. However, should activities or development be needed in the *Optional Development Envelope - Low Priority Area* those developments and activities would be described and disclosed in the Draft EIR (anticipated schedule is described below). **Figure 3** also illustrates a *Traffic and Utility Improvements Area*, which could include infrastructure and site improvements including piping and storm drain system improvements; electrical, and SCADA improvements; vehicular access improvements; landscaping improvements; and site security. While not indicated on **Figure 3**, the existing fencing may be improved or replaced along the perimeter of the GHWTP as a part of the Proposed Project.

The two staging areas (Mt. Hermon Road Staging Area and Ocean Street Extension Staging Area) that would be used during construction of the Proposed Project are shown in **Figure 1**. In addition, locations within the GHWTP may also be used for temporary staging, laydown of equipment and/or storage during construction.

Proposed Project Schedule

Design of the Proposed Project is expected to continue through 2024. Milestones are anticipated to include conceptual design (up to 30%) through early 2023 and detailed design (30-100%) through 2024. The Draft EIR is expected to be released for public review and comment in 2023 with City Council consideration of the Final EIR and Project approval in 2024.

The Proposed Project construction is anticipated to commence in phases over a four-year period (from 2024 through 2028) while maintaining ongoing operations. As the only surface water treatment plant servicing the City's water service area, the construction sequencing would maintain a continuously operating water treatment plant that produces potable water in accordance with all local, state, and federal permit requirements.

Construction would typically occur during normal weekday work hours, between 8 AM and 5 PM, with potential work outside of those hours or on weekends on an as-needed basis with prior City Water Department Director approval.

The City has identified standard construction practices that would be implemented by the City and/ or its contractors during construction activities to provide erosion and air quality controls, water quality and habitat protection, inadvertent discovery of cultural resources, construction noise practices, and fire safety measures. In addition to the standard construction practices, the Proposed Project would also implement the applicable avoidance and minimization measures from the City's two Habitat Conservation Plans and associated Incidental Take Permits under Section 10(A)(1)(B) of the Endangered Species Act. Traffic controls would be in place for construction activities on Proposed Project roadways. These practices, measures, and controls will be described in the EIR.

Probable Environmental Effects of the Proposed Project

After completing a preliminary review of the Proposed Project, as described in Section 15060(d) of the CEQA Guidelines, the City has determined that an EIR should be prepared to assess the potentially significant environmental impacts of the Proposed Project. Preparation of an Initial Study is not anticipated.

The EIR will address environmental impacts (as detailed in Appendix G: Environmental Checklist Form of the CEQA Statute and Guidelines) of the Proposed Project's construction and operation activities, and

will propose mitigation measures to address significant impacts that are identified. The following describes the anticipated environmental issues that will be addressed in the EIR.

- **Aesthetics.** Impacts related to aesthetics could result from construction and operation of the Proposed Project. Specifically, the new buildings and facilities will be assessed to determine the potential for impacts to: (1) scenic vistas (2) scenic resources along a scenic highway or designated scenic roadway; (3) existing visual character or quality including through scale incompatibility (or conflicts with applicable scenic quality regulations); and (4) day or nighttime views due to new sources of substantial light and glare. A field survey, which would visually document existing views from the Proposed Project site and to the Proposed Project site from publicly accessible vantage points in the surrounding area, will be conducted and 3-dimensional (3D) photo-simulations of the Proposed Project will be prepared from key public view locations to inform the EIR analysis. The Proposed Project area is largely shielded from public view due to surrounding topography, mature vegetation, and residential development. There are no known scenic vistas identified in the City and County general plans that would likely be impacted by the Proposed Project; however, the EIR will include an evaluation of potential impact on scenic vistas. Graham Hill Road is not a designated scenic roadway (City of Santa Cruz 2012).⁵ However, Highway 9 (0.25 miles to the west) and Highway 17 (0.75 miles to the east) are eligible State Scenic Highways (Caltrans 2019). Potential impacts of the Proposed Project on eligible scenic highways and existing visual character and quality will be assessed in the EIR.
- **Air Quality and Greenhouse Gas Emissions.** Impacts of the Proposed Project related to air quality and greenhouse gas emissions could result from temporary and short-term construction activities as well as longer-term operational activities. Operational air quality impacts and greenhouse gas emissions would include but not be limited to mobile sources, area sources, natural gas usage, electrical generation (e.g., backup generator), water supply, ozone, wastewater, and solid waste disposal. The Proposed Project is located in the North Central Coast Air Basin. The North Central Coast Air Basin is designated as non-attainment for state coarse particulate matter (PM₁₀) standards. The Air Basin is designated as unclassified or attainment for all other state and federal standards.⁶ Both construction and operational emissions of criteria pollutants and greenhouse gases will be estimated using the California Emissions Estimator Model emissions model and compared to the Monterey Bay Air Resources District emissions-based thresholds to assess potential impacts. Construction and operational health risks assessments will also be prepared to assess the effects of diesel emissions from construction equipment and from delivery and hauling trucks during operations. Impacts related to objectionable odors could also result from Proposed Project components and will be evaluated in the EIR.
- **Biological Resources.** Potential impacts on biological resources could result from construction near existing waterways, such as San Lorenzo River, and sensitive habitat areas. Potential direct and indirect impacts to sensitive vegetation communities, special-status plant (e.g., Ben

⁵ City of Santa Cruz 2030 General Plan, adopted June 2012 as amended through October 2019. [City of Santa Cruz 2030 General Plan](#).

⁶ CARB. 2021. "Maps of State and Federal Area Designations." <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Accessed May 12, 2022, and EPA. 2021. "EPA Region 9 Air Quality Maps and Geographic Information." June 10, 2021. <https://www3.epa.gov/region9/air/maps/index.html>. Accessed May 12, 2022.

Lomond spineflower) and wildlife species (e.g., Mt. Hermon June beetle), and jurisdictional aquatic resources associated with both construction and operation of the Proposed Project will be assessed. A general biological survey of the study area, habitat assessments for special-status plants and wildlife, review of available biological resources evaluations and studies from recent projects in the vicinity, and focused special-status plant surveys will be completed to support the EIR analysis. Results of the literature review and general biological survey, habitat assessments, and focused special-status plant surveys over two seasons (spring and summer) will be incorporated into a biological resources existing conditions technical report that will support the preparation of the EIR. An arborist report will also be prepared to support the EIR analysis. This section will also include discussion of applicable Habitat Conservation Plans (HCPs).

- **Cultural and Tribal Cultural Resources.** Potential impacts to cultural and tribal cultural resources could occur during ground-disturbing construction activities. Cultural and tribal cultural resources include: historic resources including both historic built environment resources (e.g., buildings) and historic resources of an archaeological nature; unique archeological resources; human remains; and tribal cultural resources. The Proposed Project will be evaluated under all applicable federal, state, and local significance criteria. If cultural or tribal cultural resources are found on the Project site or have the potential to be inadvertently discovered during construction, potential impacts from proposed modifications under the Proposed Project will be assessed and mitigation will be recommended, if warranted. A cultural resources inventory and evaluation report (that includes a records search, background research, summary of prior cultural reports that overlap with the Area of Potential Effect (APE), tribal outreach, and a pedestrian survey) is being prepared by archaeologists and architectural historians to support the EIR analysis.
- **Energy.** A temporary increase in the consumption of energy would be required during construction and an increase in the use of power may be required for operations of the new facilities. The impact analysis will assess if the Proposed Project would result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- **Geology and Soils.** Construction of the Proposed Project could result in site-specific impacts on or from local geology and soils conditions. Potential impacts related to geologic, seismic, and soils constraints will be assessed based on existing information available for the area as well as information provided in Proposed Project specific geotechnical and soils studies. Potential impacts to paleontological resources will also be evaluated based on a paleontological records search through the Natural History Museum of Los Angeles County (LACM) to determine the location of any previously recorded fossil discoveries.
- **Hazards and Hazardous Materials.** Construction of the Proposed Project could result in potential impacts related to hazards and hazardous materials, which will be evaluated in the EIR. Specifically, the hazardous materials analysis will include: the potential to encounter contaminated soils during construction based on a regulatory records review; the potential for hazardous materials release associated with transport, use, and disposal of hazardous materials during construction; and the potential for hazardous emissions or hazardous materials use during construction and operations. Building materials studies related to the

potential for lead and asbestos in existing buildings will be used to characterize the conditions of existing buildings planned for demolition.

- **Hydrology and Water Quality.** Construction of the Proposed Project could result in potential impacts related to hydrology and water quality, which will be evaluated in the EIR. This includes temporary and permanent impacts to hydrology and water quality. The Proposed Project would include piping and storm drain system improvements, to address aging stormwater facilities and a possible increase in impervious surfaces, as well as to comply with the City's Phase 2 National Pollutant Discharge Elimination System (NPDES) Permit. The impact analysis will address the adequacy of the proposed improvements in reducing stormwater runoff and water quality impacts to adjacent parcels and downstream water bodies. The impact analysis will also address temporary impacts to water quality during construction.
- **Land Use and Planning.** Potential land use and planning impacts of the Proposed Project will be assessed in the EIR. The analysis will address impacts related to the potential for physically dividing an established community or causing a significant environmental impact due to conflicts with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects. Given that the GHWTP already exists, the Proposed Project would not be expected to result in the potential for physically dividing an established community. The City and County general plans and zoning ordinances will be considered in the analysis of potential conflicts with land use plans, policies, and regulations, as relevant to the Proposed Project.
- **Noise and Vibration.** Construction and operation of the Proposed Project could result in noise and vibration impacts. Potential construction-period noise and vibration impacts to sensitive receivers (e.g., residents) in the vicinity of the Proposed Project will be assessed with modeling based on noise measurements taken at the site and review of construction phases and equipment usage. Operational noise associated with new equipment and processes on the site will also be evaluated. An existing noise conditions report based on long-term and short-term noise measurements will be prepared to document the existing ambient noise levels at the Project site.
- **Transportation.** Construction and operation of the Proposed Project could result in transportation impacts. Construction-related vehicle trips will be estimated and temporary construction-related traffic at the Project site and the staging areas will be evaluated to identify any hazardous conditions on roadways or inadequacies in emergency access that may result during construction of the Proposed Project. Similarly, for operations, the new daily and peak hour trips generated for the Proposed Project will also be estimated and a traffic analysis will be conducted along Graham Hill Road and the Project site driveway, to determine whether potential traffic hazards, such as increased vehicular queueing or hazards to pedestrian and bicycle traffic, could occur. Traffic counts will be collected on Graham Hill Road to support this analysis.

An appropriate vehicle miles traveled (VMT) evaluation will be conducted and the results of this will be described in the EIR. VMT is the new transportation metric for evaluating changes in project vehicle trips developed in response to Senate Bill 743 and the associated revisions to the CEQA Guidelines that became effective December 2018.

- **Utilities.** The Proposed Project has the potential to result in impacts related to utilities. The EIR will address: the potential impacts on the environment of any required new utility

improvements; the adequacy of the wastewater treatment infrastructure including the capacity of existing sewer lines to serve the Proposed Project; the adequacy of the solid waste capacity of local landfills to serve the Proposed Project, and the compliance of the Proposed Project to meet solid waste reduction goals. While EIRs also typically assess the sufficiency of water supplies to serve a proposed project and other future development, in this case, the Proposed Project will not demand water supply but rather will provide water supply. Therefore, the Proposed Project would not be expected to have a significant adverse impact on water supply.

- **Wildfire.** Construction of the Proposed Project has the potential to exacerbate wildfire risks or interfere with an emergency evaluation plan, which will be evaluated in the EIR. The Proposed Project is located in a Local Responsibility Area (LRA) designated as a LRA Moderate Fire Hazard Severity Zone for wildlife fires (CALFIRE 2007).⁷ The analysis will focus on the potential for construction or operation activities of the Proposed Project to impair an emergency response or evacuation plan, exacerbate wildfire risks, and expose people to risks due to postfire effects. The section will also discuss the Proposed Project's consistency with the 2020 City of Santa Cruz Water Department Emergency Response Plan, 2018 City of Santa Cruz Emergency Operations Plan and the 2021 Santa Cruz County Operational Area Management Plan, which directs City and County officials during major emergencies, such as a wildfire.⁸
- **Impacts Not Found Significant.** The EIR will explain why other effects were determined to not be potentially significant and were not discussed in detail in the EIR. For example, the Proposed Project would not occur in an area of agriculture use or protected farmland; therefore, no significant agricultural resource impacts are anticipated. Similarly, no significant impacts are anticipated for population and housing and mineral resources.
- **Other Sections.** The EIR will include additional topics as required by the CEQA Guidelines including growth inducement, cumulative impacts, and alternatives.
 - The Proposed Project would not expand the City's service area and would not increase the plant's capacity. The Proposed Project would support efficiencies in delivering water to meet water supply needs in the existing service area. The potential for growth-inducing impacts to result will be examined.
 - The EIR will address whether the Proposed Project could result in cumulative impacts that are significant when combined with the impacts of other City projects or projects occurring in the area at the same time.
 - The EIR will describe and evaluate a reasonable range of alternatives to the Proposed Project. The alternatives would feasibly attain most of the Proposed Project's basic objectives while simultaneously avoiding or substantially lessening any significant effects of the Proposed Project. The "No Project" alternative will also be evaluated as required by CEQA.

⁷ CAL Fire. 2007. 2007 Fire Hazard Severity Zone Maps. [Fire Hazard Severity Zones Maps](#).

⁸ 2020 City of Santa Cruz Water Department Emergency Response Plan, 2018 Santa Cruz Emergency Operations Plan. [City of Santa Cruz Emergency Operations Plan](#), and the Fiscal Year 2019-20 & 2020-21 Santa Cruz County Operational Plan. [Santa Cruz County Operational Plan](#).

June 27, 2022

Further Information

For environmental review information or questions about the Proposed Project, please contact Jessica Martinez-McKinney from my staff at jmartinezmckinney@cityofsantacruz.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi Luckenbach", is written over a horizontal line.

Heidi Luckenbach, P.E.

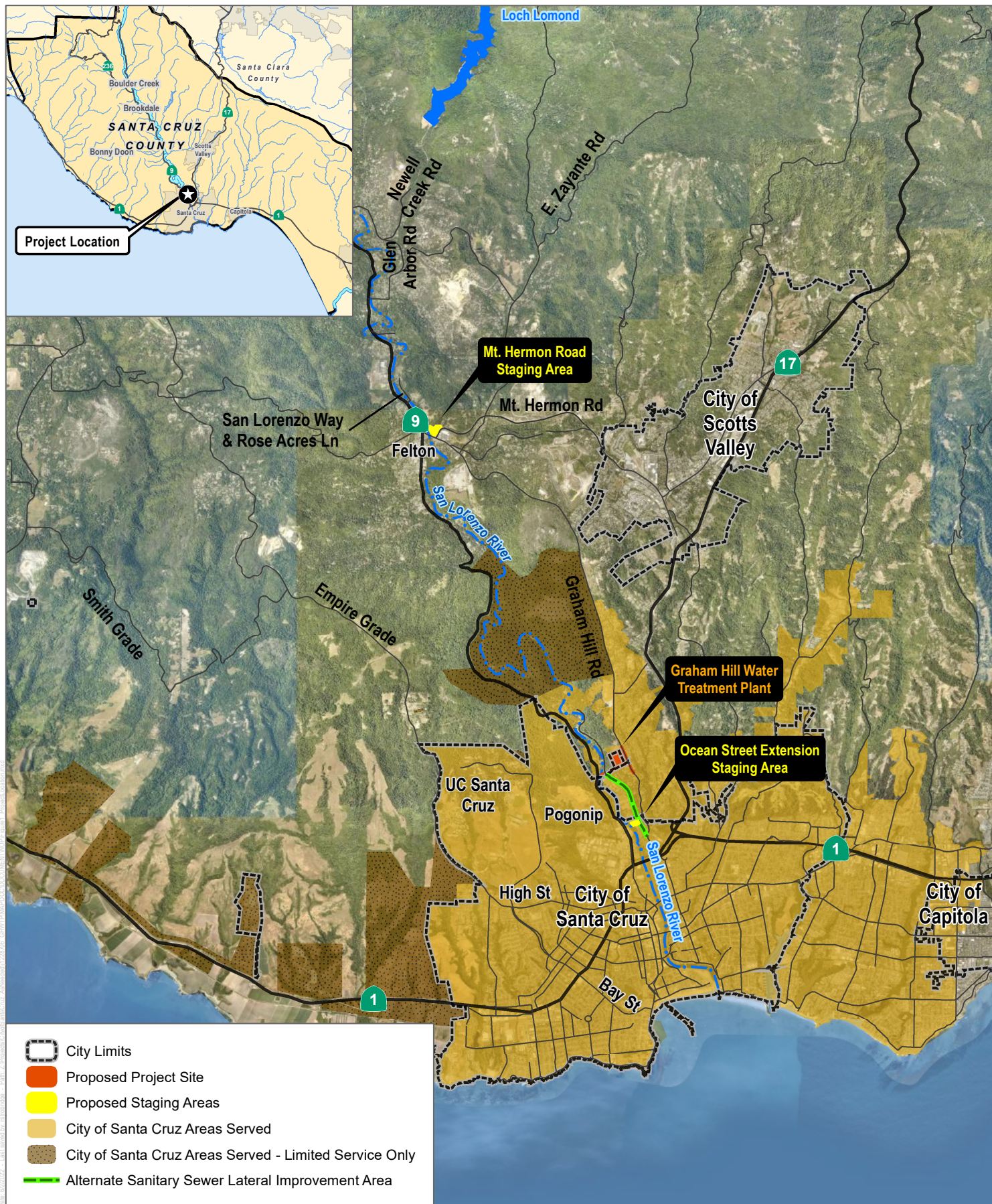
Acting Water Director, Deputy Director/Engineering Manager
City of Santa Cruz Water Department

Attachments

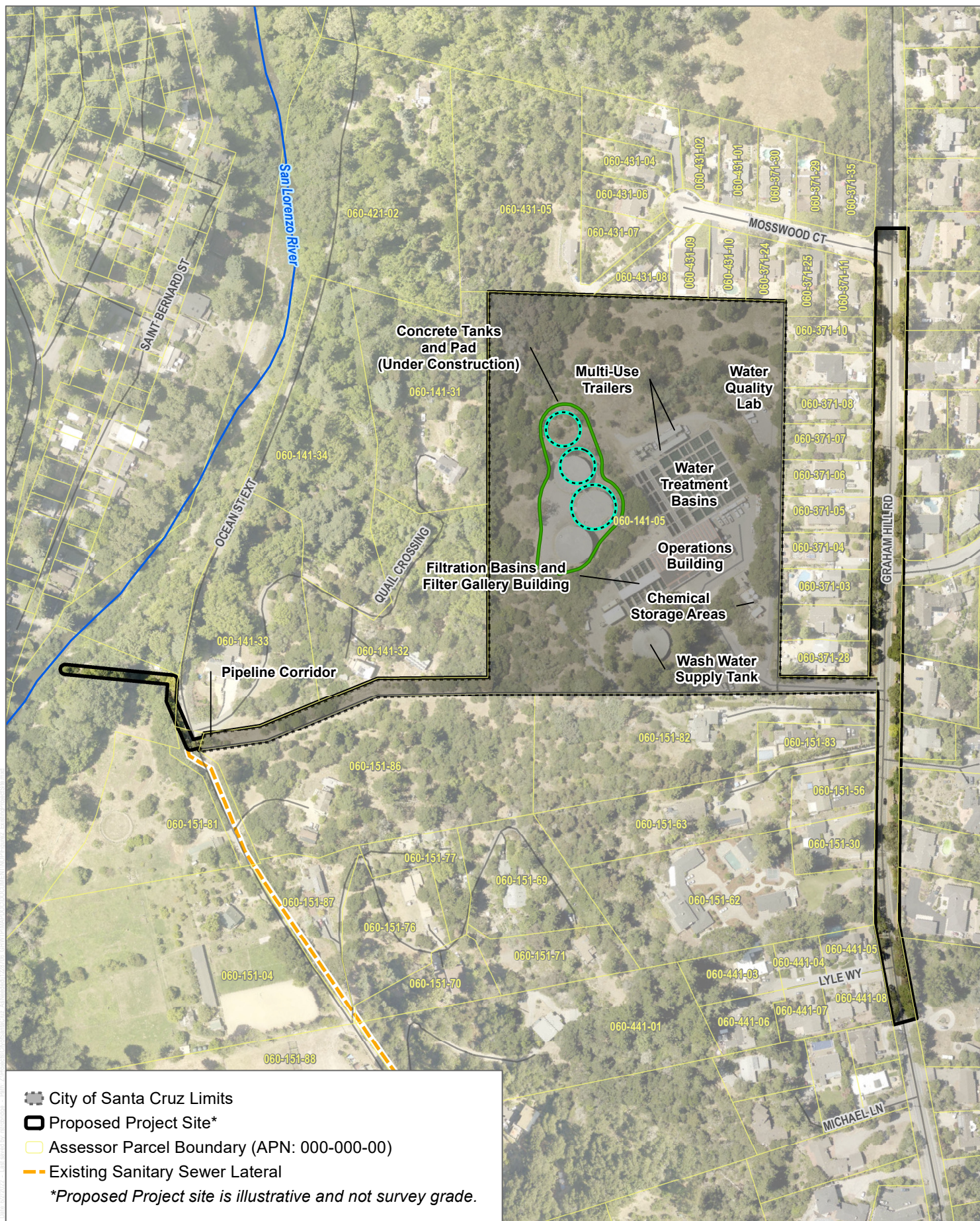
Figure 1: Project Site and Vicinity

Figure 2: Existing GHWTP Site Layout

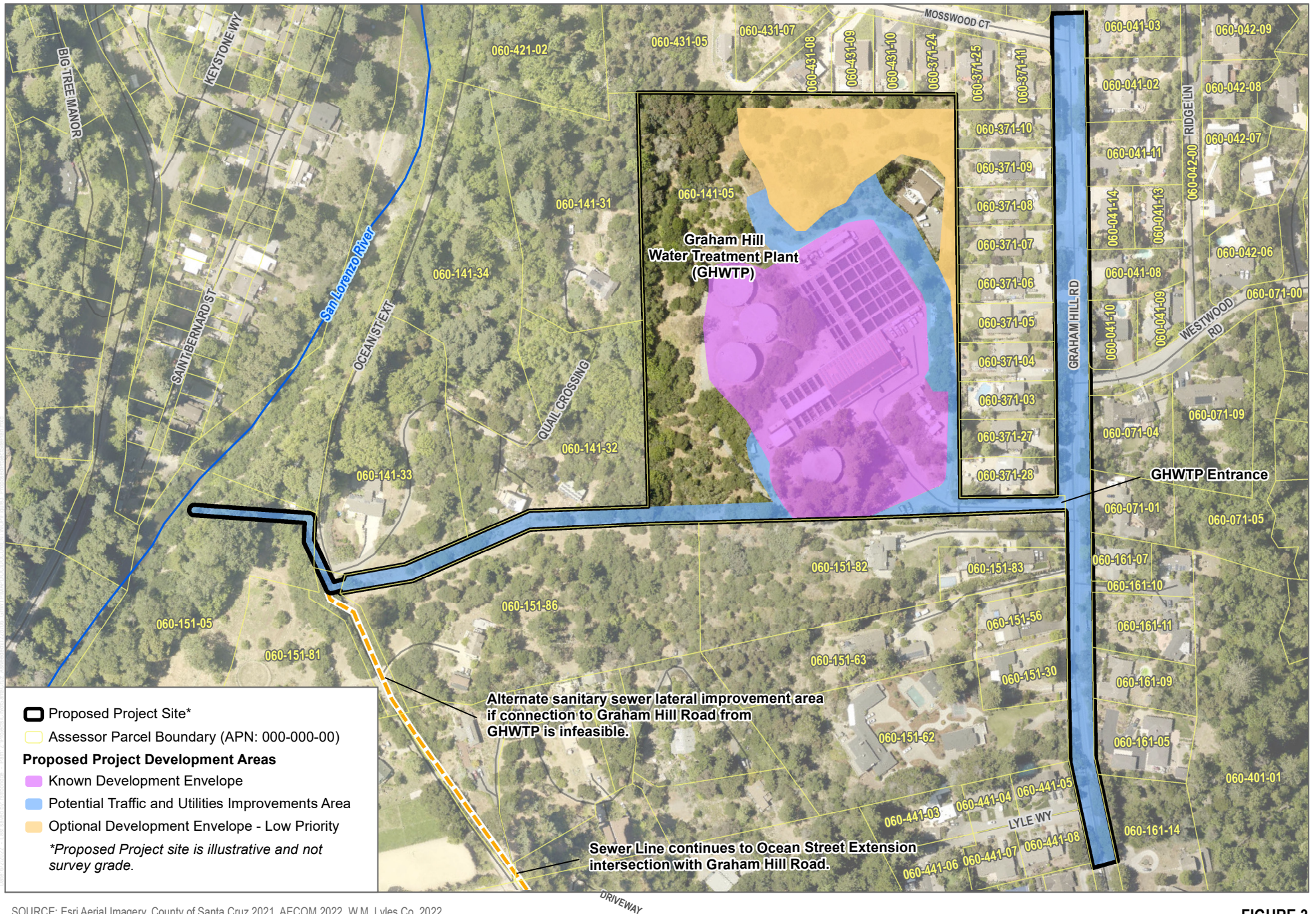
Figure 3: Proposed Project Development Areas



SOURCE: ESRI 2020, City of Santa Cruz 2020



SOURCE: Bing Maps 2021, County of Santa Cruz 2021, AECOM 2022, W.M. Lyles Co. 2022



SOURCE: Esri Aerial Imagery, County of Santa Cruz 2021, AECOM 2022, W.M. Lyles Co. 2022

FIGURE 3