



6 ALTERNATIVES

This chapter describes alternatives to the proposed Sustainability Policy and Regulatory Update of the County of Santa Cruz (County) General Plan and Local Coastal Program (LCP) and County Code (Sustainability Update or project), consistent with CEQA Guidelines section 15126.6. This chapter presents the objectives of the project, a summary of its significant environmental impacts, and a description of the alternatives that were considered but rejected from further consideration, followed by an analysis of the three alternatives evaluated, including the No Project Alternative. A comparison of the three alternatives to the project is provided, and the environmentally superior alternative is identified.

According to CEQA Guidelines section 15126.6, an environmental impact report (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 less-than-significant level 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.

The lead agency is responsible for selecting a reasonable 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 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 that are infeasible. “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 (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. Under CEQA case law, the concept of feasibility also “encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental,

social, and technological factors.” In assessing the feasibility of alternatives, agency decisionmakers may also take account of the extent to which the alternatives meet or further the agency’s underlying purpose or objectives in considering a proposed project.

6.1 PROJECT OBJECTIVES

As indicated in Chapter 3, Project Description, section 15124 of the CEQA Guidelines indicates that the EIR project description shall include a statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR. In conducting the alternatives analysis, consideration must be given as to how, and to what extent, an alternative can meet the project’s basic objectives. The objectives for the project, identified in Chapter 3, are as follows:

1. **Sustainable Development.** Foster a sustainable growth pattern that focuses on efficient use of urban lands, compact infill development along transportation corridors, and neighborhood-serving land uses; promotes economic vitality; and preserves the county’s natural environment and critical environmental areas.
2. **Agriculture.** Promote the economic viability and environmental sustainability of the county’s agricultural economy by protecting agricultural land and supporting a diverse and competitive agricultural industry.
3. **Conservation and Open Space.** Protect and enhance the county’s unique environmental setting, diverse open spaces, and cultural and natural resources.
4. **Multimodal Transportation Network.** Improve the county’s circulation system to provide an accessible, comprehensive, and effective transportation network that promotes active transportation modes and reduces traffic congestion by integrating automobile use with multimodal transportation options, including enhanced public transit, bicycle, and pedestrian amenities throughout the county.
5. **Housing.** Expand the county’s housing inventory to create diverse neighborhoods including a mix of housing types, a range of density options and more affordable housing options, and to accommodate regional housing forecasts. Promote the building, retention, and renovation of quality housing for all incomes, ages, and abilities.
6. **Neighborhood Vitality and Services.** Expand and improve walkable neighborhoods and neighborhood vitality with neighborhood-serving shopping areas and services to provide better local services near housing areas and reduce vehicle trips.
7. **High-Quality Design.** Protect and enhance community character and maintain the identity and vitality of existing neighborhoods through high-quality architecture and design in new buildings, major additions, and redevelopment of existing properties that reflect the character of the surrounding neighborhood.

8. **Economic Vitality.** Expand and enhance employment opportunities to diversify the county's job base, promote a strong local economy, support the creation of jobs for the County's resident workforce, and achieve a better balance between jobs and housing in the county.
9. **Climate Change and Reduction of Greenhouse Gas Emissions.** Reduce greenhouse gas emissions to achieve all adopted targets, and proactively address climate change by implementing sustainable land use and transportation policies and programs that promote efficient use of energy and alternative energy sources.
10. **Healthy Communities.** Facilitate economic, social, and physical health and wellness by promoting sustainable development that fosters economic opportunities, physical activity, active transportation, access to healthy foods and healthcare, and neighborhood centers that enable residents to meet daily needs, such as shopping, employment, and recreation, in close proximity to their homes.
11. **Healthcare and Medical Facilities.** Enhance the medical services activity center on Soquel Drive between Mattison Lane and Soquel Avenue by promoting medical mixed uses in this area.
12. **Environmental Justice.** Promote the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies; protect disadvantaged communities from a disproportionate burden posed by exposure and risk to environmental hazards; encourage equitable access to transit and active transportation, housing, as well as services and recreational opportunities; and continue to promote civil engagement in the public decision-making process.
13. **Pleasure Point and Portola Corridor.** Implement the Pleasure Point Commercial Corridor Vision and Guiding Design Principles to meet the community's vision regarding future development in Pleasure Point and along Portola Drive.
14. **Update Zoning Regulations and Permitting.** Modernize and streamline the County's zoning and land use regulations and permitting process through updates that reflect new land use policies and development standards.
15. **Align with State Law and Regional Plans.** Update the General Plan/Local Coastal Program and Santa Cruz County Code to address new requirements of state law; incorporate population, housing, and employment forecasts; and achieve compliance with all applicable state laws and regulations.
16. **Parcel Changes.** Implement parcel zone amendments to provide consistency with General Plan land use designations and to facilitate development of opportunity sites, such as underutilized properties along Portola Drive and on APN 025-351-19 in Live Oak.

6.2 OVERVIEW OF SIGNIFICANT PROJECT IMPACTS

The following potentially significant and/or significant impacts have been identified, none of which can be mitigated to a less-than-significant level.

- **Impact AGR-1: Farmland Conversion.** Adoption and implementation of the proposed Sustainability Update could indirectly lead to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- **Impact BIO-2B: Sensitive Habitats (Thurber Lane/Soquel Drive Parcel).** Implementation of the proposed Sustainability Update could indirectly result in future development at the Thurber Lane/Soquel Drive property, which could impact sensitive habitats, including riparian and wetland habitats, and associated potential special status species.
- **Impact CUL-1: Historical Resources.** Adoption and implementation of the proposed Sustainability Update could indirectly lead to development that could result in a substantial adverse change in the significance of historical built resources.
- **Impact TRA-1: Conflict with County Vehicle Miles Traveled (VMT) Threshold.** Adoption and implementation of the proposed Sustainability Update would indirectly generate new development that could exceed the County's adopted VMT threshold.
- **Cumulative Transportation- VMT Impact.** Cumulative development and growth, both within the unincorporated county and in the incorporated cities, would result in a significant cumulative impact related to conflicts with VMT thresholds as the County's VMT threshold would not be met. The project's contribution would be a cumulatively considerable contribution, resulting in a significant and unavoidable cumulative impact related to VMT.
- **Impact UTL-2: Water Supplies.** Adoption and implementation of the proposed Sustainability Update could lead to development that could result in future increased demand for domestic water supplies, but two existing providers (City of Santa Cruz and Soquel Creek Water District [SqCWD]) may not have sufficient water supplies available to serve the development indirectly resulting from implementation of the Sustainability Update and reasonably foreseeable future development during normal, dry, and multiple years.
- **Cumulative Water Supplies Impact.** Cumulative development and growth within the service area of the SqCWD District could potentially result in a significant cumulative impact related to availability of adequate water supplies, and the project's contribution would be a cumulatively considerable contribution, resulting in a potentially significant and unavoidable cumulative impact related to water supplies for this water district.

6.3 ALTERNATIVES CONSIDERED BUT ELIMINATED

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, 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:

- Failure to meet most of the basic project objectives;
- Infeasibility; or
- Inability to avoid significant environmental impacts.

The County considered the following project alternatives, which were eliminated from further consideration as explained in the following section:

- Alternative Locations
- No Development Alternative
- Increased Development in Urban Areas
- Enhanced Transportation Demand Management

Public and agency comments were received during the public scoping period in response to the Notice of Preparation (NOP), which is included in Appendix A. A summary of the comments received during the scoping period for this EIR, as well as written comments received, are included in Appendix B. Comments related to alternatives included the following, which are also addressed in the following sections:

- The EIR should have a robust Alternatives section with a focus on major policy direction, such as growth rate, location of new or more intense population density, limitations regarding water supply, and east-west transportation options.
- As part of the Alternatives analysis, the EIR should include shifting dense residential and mixed-use developed closer to the railroad corridor.
- Alternatives should look at development along rail corridor instead of along transportation corridors; people are reluctant to use public transportation, but may use alternative transportation along rail corridor.

6.3.1 Alternative Locations

CEQA Guidelines section 15126.6(f)(2) states that the “key question and first step” in analysis of alternatives is whether any significant impacts would be avoided or substantially lessen by moving the project to an alternative location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.

The Sustainability Update is a comprehensive update of the existing General Plan/LCP and Santa Cruz County Code (SCCC) for the County of Santa Cruz. The Sustainability Update establishes the County’s vision for development and resource management through the year 2040 and would serve as the fundamental land use and resource policy document guiding development and resource management within the unincorporated areas of the county. Therefore, an alternative site or location where the project could be implemented would not be feasible or appropriate because the County only has jurisdiction over lands within its legal boundaries.

The proposed project does include General Plan/LCP land use and/or zoning map amendments for 23 parcels, as summarized in Table 3-11 and shown on Figures 3-6A through 3-6D in Chapter 3, Project Description. Ten parcels in the Live Oak planning area within the County’s Urban Services Line (USL) are proposed to be redesignated the County’s new proposed Urban High “Flex” Residential (R-UHF) land use designation with one parcel also including a change in the existing commercial designation. Alternative locations for these designations were considered in accordance with proposed policies that seek to encourage intensified development in the USL and along major transportation corridors, including the rail corridor. The first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. Redesignation of other properties in the Live Oak planning area along Soquel Drive and/or Soquel Avenue would not avoid or substantially lessen any identified significant impact. In particular, potential significant impacts related to VMT and water supplies would be not be eliminated by shifted to another location within the same area of potential impact.

The other 13 parcels proposed for General Plan/LCP land use and zoning map amendments are located throughout the county, and generally the land use map/zoning map redesignations are proposed primarily to provide consistent designations where there is more than one land use designation on the parcel or to reflect long-established land uses on the sites. Most of these parcels are located outside of the USL. The properties do not fall within locations where significant impacts have been identified. Because of this and the fact that the redesignations/rezonings are property-specific, no further consideration of alternative sites was deemed necessary.

Therefore, for the reasons explained above and because alternative locations would not avoid or substantially lessen significant impacts, redesignation of alternative sites in the USL was eliminated from further consideration.

6.3.2 No New Intensified Development Alternative

All of the potentially significant and unavoidable effects of the Sustainability Update are associated with the future estimated development and growth that could potentially be accommodated by the project. The No New Intensified Development Alternative would assume no further development in the county beyond what is currently allowed by the existing General Plan/LCP. This alternative was rejected from detailed consideration because it would represent the “No Project” alternative that is evaluated below. This

alternative would not achieve several of the objectives established for the Sustainability Update, specifically, the objectives related to providing housing; public facilities, services, and infrastructure; and economic vitality. As a result, this alternative has been rejected from further consideration.

6.3.3 Increased Growth and Development

This alternative would consider increased growth and development assumptions than what was considered for this EIR. This alternative would result in increased potential development in the County's USL over what has been considered as a result of the proposed Sustainability Update. The proposed project already includes policies that support intensified and higher density development in the USL, including along major roadways and the rail corridor. Further increases in development were not considered realistic given historic growth rates and annual limits on residential permits established by the County. In addition, this alternative could potentially result in more significant impacts related to historical resources and water service. For these reasons, this alternative has been rejected from further consideration.

6.3.4 Enhanced Transportation Demand Management

This alternative would consider additional transportation demand management (TDM) measures to further reduce VMT in the county. Given the comprehensive suite of policies that support TDM measures and programs in the proposed Sustainability Update and the proposed revisions to the TDM regulations in the County's SCCC, there were not a wide range of additional measures that could be considered. Potential measures relating to parking management measures, including implementation of paid parking with use of revenues to help fund transit measures, were identified. However, it is not certain that these measures would lead to a substantial reduction in the significance of the project and cumulative VMT impacts. This alternative also would not address other potentially significant impacts, and therefore, was eliminated from further consideration. However, consideration of parking management strategies is included as a General Plan/LCP implementation strategy is included as a mitigation measure for the identified VMT impact.

6.4 ALTERNATIVES SELECTED FOR ANALYSIS IN EIR

This section describes the alternatives to the proposed project that were selected and analyzed according to CEQA Guidelines section 15126.6(a) after elimination of some considered alternatives as explained in Section 6.3, Alternatives Considered but Eliminated. The analyzed alternatives, including the No Project Alternative, represent a reasonable range of alternatives to the proposed project that would feasibly attain most of the proposed project's basic objectives, and would avoid or substantially lessen the significant adverse environmental effects of the proposed project. The proposed project's objectives are listed in Section 6.1, Project Objectives. Significant project impacts are summarized in Section 6.2, Overview of Significant Project Impacts, and described in detail in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures.

The following three alternatives were selected for comparative analysis in this EIR:

- **Alternative 1: No Project Alternative.** The No Project Alternative is required by CEQA and consists of the circumstances under which the proposed project does not proceed.
- **Alternative 2: Reduced Growth.** Alternative 2 considers potential growth and development resulting from implementation of the Sustainability Update at a rate that is consistent with the Association of Monterey Bay’s (AMBAG’s) current adopted regional population, housing, and employee growth projections.
- **Alternative 3: Reduced Project.** Alternative 3 would entail two components that would result in reduced development potential. The first would be elimination of proposed General Plan/LCP Land Use and zoning map changes for 10 parcels in the USL: nine along Portola Drive and the Thurber Lane/Soquel Drive parcel. Existing land use and zone designations for these parcels would be retained. The second component would eliminate proposed policies and regulations that would allow public/quasi-public uses on agricultural lands.

Each alternative is described below. The following discussion reviews whether the alternative would avoid or substantially lessen identified significant impacts, whether new significant impacts would potentially occur, and the ability of the alternative to meet project objectives. Table 6-1 summarizes potential growth and development assumptions associated with the proposed Sustainability Update and each alternative. Table 6-5 at the end of this section provides a summary comparison of each alternative’s ability to attain project objectives.

Table 6-1. Comparison of Potential Growth and Development Between the Proposed Project and Alternatives

Net Change, 2020-2040	Proposed Project ¹	Alternative 1 No Project ²	Alternative 2 Reduced Growth ³	Alternative 3 Reduced Project ⁴
Approximate Net Population Increase ⁵	11,385	7,365	8,890	10,375
Net Increase in Housing Units	4,500	2,910	3,515	4,100
Net Increase in Jobs/Employees	7,035	6,215	5,490	6,930
Net Increase in Non-Residential Development (in square feet)	6,209,550	4,169,600	4,556,700	6,110,000

Notes: Numbers are rounded.

¹ See Section 4.0.2.2 and Appendix C regarding growth assumptions developed for the EIR. See Section 4.13, Population and Housing regarding housing and population increases indirectly resulting from the proposed project.

² See Appendix C for Alternative 1 estimates.

³ See Section 4.13, Population and Housing and Appendix C regarding Alternative 2 estimates based on existing adopted AMBAG Regional Growth Forecast (2018).

⁴ Estimate based on eliminating proposed high density residential land use designation from 10 parcels in the USL and removing policy/regulations to permit public/quasi-public uses on agricultural land.

⁵ Population increases based on average household size of 2.53 in unincorporated county.

6.4.1 Alternative 1: No Project Alternative

6.4.1.1 Description

Section 15126.6(e) of the CEQA Guidelines requires that the impacts of a “no project” alternative be evaluated in comparison to the proposed project. Section 15126.6(e) also requires that the No Project Alternative discuss the existing conditions that were in effect at the time the NOP 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. For a project that is a revision of an existing land use or regulatory plan, policy or ongoing operation, the No Project Alternative would be the continuation of the existing policy, or operation into the future according to CEQA Guidelines section 15126.6(e)(3)(A). Thus, the impacts of the proposed plan would be compared to the impacts that would occur under the existing plan.

Under Alternative 1-No Project, the General Plan/LCP and SCCC would not be amended. None of the proposed General Plan/LCP land use or zone map changes would be implemented, and the proposed County Design Guidelines would not be approved or implemented. Instead, future new development in the county would follow the land use designations, policy guidance, and regulations contained in the existing General Plan/LCP and SCCC. The existing General Plan/LCP would continue to allow for new development in the county, but would not account for development intensification, new roadways, and multimodal planning or other sustainable policies that are supported by the proposed Sustainability Update.

To aid the environmental analysis related to potential impacts of new development accommodated by the proposed project, the Santa Cruz County Community Development and Infrastructure Department developed a methodology to forecast residential and non-residential growth that could occur in the year 2040, which is summarized in Section 4.0.2.2 and explained in Appendix C. These estimates are provided by County planning area (see Figure 3-3 for location of planning areas). The estimates include a scenario for the year 2040 without the proposed project, which represents a “no project” scenario.

The estimated net increase in potential new housing units that could be accommodated under the existing General Plan/LCP under Alternative 1-No Project is summarized in Table 6-2 by planning area. Table 6-2 shows a potential increase of approximately 2,910 housing units over existing conditions, with approximately 60% of new development estimated to occur within the County’s USL.

Alternative 1-No Project uses the 2040 AMBAG forecast as the basis for job growth with adjustments made to account for adopted land use plans, local zoning ordinances, and approved development projects as further explained in Appendix C. The amount of new building square footage to accommodate new employees also was forecasted and is summarized in Table 6-3. Under the existing General Plan/LCP, a potential increase of approximately 4,169,600 square feet of non-residential uses is estimated throughout the county with approximately 67% estimated to occur within the County’s USL.

When compared to the proposed Sustainability Update, the Alternative 1-No Project would result in potential development of approximately 35% fewer total housing units and approximately 33% less non-

residential building space than estimated for the proposed project. As with the proposed project, future development under the No Project Alternative would occur incrementally or gradually over the 20-year buildout horizon (i.e., 2020 to 2040). However, while this assumption describes the long-range nature of the No Project Alternative, it does not prohibit or restrict when development can occur over the horizon period. Furthermore, this estimated growth may or may not occur, and these estimates do not establish a limit to development. Annual limits for residential units are set annually by the County pursuant to Measure J and SCCC provisions as explained in Section 4.13 of this EIR, Population and Housing.

**Table 6-2. Alternative 1-No Project
Potential Residential Development (Dwelling Units) By Planning Area**

Planning Area	Housing Units Base Year	Housing Units 2040 No Project	Net Increase Over Base Year
Aptos Hills	2,338	2,415	77
Aptos	8,261	8,706	445
Bonny Doon	1,422	1,472	50
Carbonera	4,174	4,346	172
Eureka Canyon	1,361	1,400	39
Live Oak	11,536	12,360	824
La Selva	744	775	31
North Coast	397	410	13
Pajaro Valley	3,431	3,684	253
San Andreas	620	680	60
Skyline	1,182	1,218	36
San Lorenzo Valley	9,684	10,027	343
Summit	2,318	2,447	129
Soquel	3,854	4,276	422
Salsipuedes	419	434	15
Total	51,741	54,650	2,909

Source: County of Santa Cruz, October 2020

Note: The projections in this table are intended to show potential net increases in housing units as a result of implementation of the Sustainability Update. The total number of housing units in the base year were derived from the traffic model based on occupied units. This information was provided for the year 2019 and was extrapolated from the 2010 Census, the most recent data available at the time the traffic model was developed. The existing number of units 51,741 in this table correlates to the California Department of Finance estimate of occupied housing units in the year 2019 of 51,467 units (California Department of Finance 2021). Section 4.13 provides the total number of housing units (occupied and unoccupied) based on the 2020 Census, which represents the baseline for analyses in this EIR. See Appendix C for further description of the potential growth assumptions developed for this EIR.

Table 6-3. Alternative 1-No Project Summary of Net Increase in Non-Residential Development By Planning Area (in square feet)

Planning Area	Industrial	Retail	Service	Public	Total
Aptos Hills - Existing	47,918	144,188	313,698	141,267	647,071
2040 No Project	46,075	111,870	329,703	168,609	656,257
Aptos - Existing	57,133	872,586	4,670,259	1,650,936	7,250,914
2040 No Project	62,662	837,782	4,954,081	2,253,111	8,107,636
Bonny Doon -Existing	14,744	120,571	362,780	72,912	571,007
2040 No Project	20,273	174,020	390,552	301,413	845,209
Carbonera - Existing	33,174	120,571	817,322	203,112	1,174,179
2040 No Project	46,975	174,020	1,093,675	250,685	1,564,405
Eureka Canyon - Existing	14,744	113,113	348,909	122,388	599,154
134,539	134,539	103,169	369,182	132,804	739,694
Live Oak - Existing	307,781	2,032,305	6,345,449	2,068,878	10,754,413
2040 No Project	431,262	1,885,631	5,514,256	4,185,930	12,017,079
La Selva - Existing	1,843	45,991	96,030	20,181	164,045
2040 No Project	1,843	45,991	99,231	20,832	167,897
North Coast - Existing	410,989	72,094	396,924	35,154	915,161
2040 No Project	405,460	88,253	438,537	53,832	985,632
Pajaro Valley - Existing	11,058	108,141	363,847	157,542	640,588
2040 No Project	49,761	121,814	458,810	203,112	833,497
San Andreas - Existing	757,473	73,337	672,210	51,429	1,554,449
2040 No Project	753,787	65,879	720,225	59,892	1,599,783
Skyline - Existing	-	8,701	14,938	1,953	25,592
2040 No Project	5,529	8,701	14,938	1,953	31,121
San Lorenzo Valley - Existing	289,351	974,512	2,338,864	908,796	4,511,523
2040 No Project	274,607	902,418	2,502,115	1,186,122	4,865,262
Summit - Existing	14,744	73,337	113,102	26,691	227,874
2040 No Project	14,744	85,767	92,829	26,691	220,031
Soquel - Existing	344,641	1,680,536	2,355,936	657,510	5,038,623
2040 No Project	326,211	1,656,919	2,594,944	861,273	5,439,347
Salsipuedes - Existing	20,273	33,561	105,633	16,275	175,742
2040 No Project	112,423	58,421	151,514	24,738	347,096
Total - Existing	2,325,866	6,473,544	19,315,901	6,135,024	34,250,335
2040 No Project	2,685,251	6,279,636	19,724,562	9,730,497	38,419,946

Source: County of Santa Cruz, October 2020

6.4.1.2 Impact Analysis

Under the No Project Alternative, the proposed Sustainability Update would not be adopted and implemented, and none of the impacts identified in the EIR for this project would occur. However, development and growth would continue under the existing adopted General Plan/LCP over the next 20 years or until such time that updates were proposed. Therefore, Alternative 1-No Project would result in some impacts as discussed below.

Agricultural Resources

Impacts related to conversion of Farmland of Statewide Importance, including prime agricultural lands, would be reduced with Alternative 1-No Project as proposed changes to the General Plan/LCP and SCCC that would allow expanded agricultural support uses and public/quasi-public uses on agricultural lands would not occur. Potential development of single-family residences, farmworker housing, and accessory structures on agricultural lands would continue under the existing General Plan/LCP and SCCC regulations, which also include provisions to locate structures to minimize conversion of agricultural land. Therefore, Alternative 1-No Project would result in a substantial reduction in potential conversion of agricultural land, and would reduce the impact to a less-than significant level.

Biological Resources

A potentially significant impact to riparian and sensitive habitat was identified with potential future development on one parcel located at Thurber Lane/Soquel Drive if the existing ephemeral stream were converted to an underground storm drain. Under Alternative 1-No Project, the property land use and zone designations would not change, and existing neighborhood commercial and office designations would remain in place. Thus, future development could occur on the site, but with existing commercial land use and zone district designations. Future development under Alternative 1 could also include potential impacts to the existing ephemeral stream and associated sensitive riparian and aquatic habitats on the property if the stream were converted to an underground storm drain, and Mitigation BIO-1 would be required as with the proposed project to provide a restoration plan should the stream be altered as part of future development. Therefore, this alternative would not eliminate or reduce the significance of this impact

Cultural Resources

Under Alternative 1-No project, potential future development would occur under the existing General Plan/LCP and SCCC regulations. As with the proposed project, there is potential for redevelopment of sites that have structures older than 50 years in age, which would require review to determine whether the structure would be considered a historical resource. As with the proposed project, future development projects would be required to undergo project-level environmental review to analyze potential impacts to historical resources and mitigate any impacts to the extent feasible. Through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, especially with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, Alternative 1-No Project could also result in future development that could potentially result in a substantial adverse change to an historical resource, but impacts to historical resources under the Alternative 1 could result in a reduced impact than with the proposed project due

to the potential reduced development that is estimated to occur under this alternative, and Mitigation Measures CUL-1 and CUL-2 would continue to be required as with the proposed project. However, the impact would not be reduced to a less-than-significant level.

Utilities-Water Service

Adoption and implementation of the proposed Sustainability Update would not directly result in new development, but new development accommodated by the proposed project would result in demand for domestic water supplies that may approach or exceed development estimates in the City of Santa Cruz and SqCWD 2020 Urban Water Management Plans (UWMPs) that were used to forecast water demand over the next 20 years. The EIR concludes that the proposed project may indirectly result in demand that exceeds available water supplies in the City of Santa Cruz and SqCWD, which may be significant and unavoidable depending on the actual amount and timing of future development that occurs in the county and the City of Capitola that also is located in the service area of these two water purveyors.

Under Alternative 1-No Project, it is estimated that future housing development within the county would be approximately 40% less in the Live Oak planning area, which is served by the City of Santa Cruz, and the potentially significant impact on water supplies would be substantially reduced as the reduced number of housing units would fall well within the projections included the City's 2020 UWMP. Thus, the potential impact within the City of Santa Cruz water service area would be reduced to a less-than-significant level under Alternative 1-No Project. While the City forecasts a shortfall of approximately 2% during the 5th year of a multi-year drought, the City considers this negligible and would not prevent the City from providing service to its customers. Future housing unit estimates in the SqCWD under Alternative 1 are approximately 5% less than estimates for the project, which would result in a slight, but not substantial, reduction in water demand. Therefore, impacts to SqCWD water supplies would be reduced, but not to a less-than-significant level as the amount of estimated development may approach or exceed forecasts in the SqCWD's 2020 UWMP. Therefore, potentially significant project and cumulative impacts related to availability of water supplies under Alternative 1-No Project could be substantially reduced due to reduction of impact in the City of Santa Cruz water service area, but not avoided or reduced to a less-than significant level due to potential impacts in the SqCWD service area that would not be substantially reduced.

Transportation-VMT

The VMT analysis conducted for the proposed Sustainability Update also included a 2040 No Project scenario; see Appendix G-2. As discussed in Section 4.15, Transportation, the proposed project would result in a reduced VMT for residential VMT per capita, VMT per office/service employee, and VMT per employee for other employment land uses from existing conditions, but would not meet the County's VMT threshold, resulting in a significant impact. Alternative 1-No Project is projected to result in a VMT of 11.9 for residential per capita, 9.2 per employee for office/service uses, 15.3 employee for industrial uses, and 9.3 VMT for employee for public land uses as summarized in Tables 4.15-3 and 4.15-5 in Section 4.15. VMT under Alternative 1-No Project would be less than the existing baseline

year VMT, but slightly higher in 2040 than what would occur with the proposed project for residential and office/service uses and slightly lower for other employment uses. Mitigation Measures TRA-1 and TRA-2 would continue to be warranted under this alternative. While 1-No Project would slightly reduce VMT for some employment sectors, it would not reduce the significant project or cumulative impacts related to meeting the County VMT threshold to a less-than-significant level.

Other Impacts

Other less-than-significant impacts identified for the proposed project would be the same or slightly reduced with Alternative 1-No Project as there would be continued development under the existing General Plan/LCP and SCCC regulations, but at a potentially lesser amount than with the proposed project. This alternative would not result in new significant impacts not otherwise identified as part of the proposed project.

6.4.1.3 Ability to Meet Project Objectives

Table 6-4 at the end of Section 6.4 summarizes and compares how the proposed project and evaluated alternatives meet project objectives. Alternative 1-No Project would fail to meet all but four of the 16 project objectives. Alternative 1 would fully meet project objective 3 for protection and conservation of the county's open space areas as no substantial revisions to existing policies or regulations governing open space protection are included in the proposed project. However, Alternative 1 would only partially meet three other objectives. Objective 2 regarding economic vitality and sustainability of agricultural lands would be only partially met as Alternative 1 would not include agri-tourism, special events, farmstays, and agricultural support services as included in the proposed project. Alternative 1 also partially meets Objective 5 regarding a mix of residential uses and Objective 8 regarding economic vitality in the county as development would continue to be allowed under existing policies and regulations, but to a lesser degree than with the proposed project.

6.4.2 Alternative 2: Reduced Growth

6.4.2.1 Description

Alternative 2 assumes that future development in Santa Cruz County under the proposed Sustainability Update would be guided by a reduced growth assumption that would lower the level of development on average by approximately 25%. Alternative 2 assumes that future development and growth would occur consistent with AMBAG's current Regional Growth Forecast that was adopted in 2018. Under this growth assumption, it is estimated that there could be an increase in approximately 3,515 housing units by 2040 based on AMBAG projections and existing housing units in 2020 as reported in the U.S. Census. This represents an approximate 22% reduction from the proposed project. Similarly, non-residential development is estimated at approximately 4,556,700 square feet, which is approximately 27% less than estimated for the proposed project. Under Alternative 2, development of all land use types would be less than envisioned in the Sustainability Update, but slightly higher than under Alternative 1-No Project as summarized in Table 6-1.

6.4.2.2 Impact Analysis

Agricultural Resources

Impacts related to conversion of Farmland of Statewide Importance, including prime agricultural lands, would not be eliminated under Alternative 2-Reduced Growth, but may be slightly reduced due to a reduced level of growth and development that is assumed under this alternative. Policy and regulatory amendments that would allow expanded agricultural support uses and public/quasi-public uses on agricultural lands would continue to be included in the project, and Mitigation Measure AGR-1 would continue to be required as with the proposed project. Therefore, Alternative 2-Reduced Growth would result in a slight reduction in the severity of the impact, but would not reduce the impact to a less-than significant level.

Biological Resources

A potentially significant impact to riparian and sensitive habitat was identified with potential future development on one parcel located at Thurber Lane/Soquel Drive if the existing ephemeral stream were converted to an underground storm drain. Under Alternative 2-Reduced Growth, the property land use and zone designations would continue to be proposed to be changed to a high-density/commercial mix. Future development of the site under Alternative 2 could result in potential impacts to the existing ephemeral stream and associated sensitive riparian and aquatic habitats on the property if the stream were converted to an underground storm drain similar to the proposed project, and Mitigation BIO-1 would be required as with the proposed project to provide a restoration plan should the stream be altered as part of future development. Therefore, Alternative 2-Reduced Growth would not eliminate or reduce the significance of this impact,

Cultural Resources

Under Alternative 2-Reduced Growth, potential development would occur under the proposed Sustainability Update, but with a lesser amount of total development than estimated for the proposed project. As with the proposed project, there is potential for redevelopment of sites that have structures older than 50 years in age, which would require review to determine whether the structure would be considered a historical resource. As with the proposed project, future development projects would be required to undergo project-level environmental review to analyze potential impacts to historical resources and mitigate any impacts to the extent feasible. Through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, especially with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, Alternative 2-Reduced Growth could result in future development that could potentially result in a

substantial adverse change to an historical resource. Impacts to historical resources could result in a reduced impact than with the proposed project due to potential reduced development that is estimated to occur under this alternative, and Mitigation Measures CUL-1 and CUL-2 would continue to be required as with the proposed project. However, the impact would not be reduced to a less-than-significant level.

Transportation-VMT

As discussed in Section 4.15, Transportation, the proposed project would result in a reduced VMT for residential VMT per capita, VMT per office/service employee, and VMT per employee for other employment land uses from existing conditions, but would not meet the County's VMT threshold, resulting in a significant project and cumulative impact. Alternative 2-Reduced Growth would include proposed policies that support intensified development in urban areas as included with the proposed project, which would facilitate reduced automobile travel and a resulting VMT reduction. Under Alternative 2, assumptions that growth and development would occur in accordance with regional growth forecasts would result in an overall development reduction of approximately 22% for residential uses and approximately 27% for other uses. Based on the level that the proposed project is estimated to exceed the County's VMT threshold as summarized in Tables 4.15-3 and 4.15-5 in Section 4.15, Transportation, the reduction in office/service land uses could potentially bring VMT for this sector closer to or below the County's threshold, but the reduction would not be great enough to bring VMT for the other sectors to within the County's adopted threshold and would continue to result in a significant impact. Mitigation Measures TRA-1 and TRA-2 would continue to be warranted under this alternative as with the proposed project. Therefore, VMT under Alternative 2-Reduced Growth could be potentially reduced, but the significant project and cumulative impacts would not be reduced to a less-than-significant level as the County's threshold is expected to continue to be exceeded due to residential and other employment land uses.

Utilities-Water Service

The EIR concludes that the proposed project may indirectly result in demand that exceeds available water supplies in the City of Santa Cruz and SqCWD, which may be significant and unavoidable, depending on the actual amount and timing of future development that occurs in the county and the City of Capitola that also is located in the service area of these two water purveyors.

Under Alternative 2-Reduced Growth, it is estimated that future housing development within the county would be approximately 22% less in the Live Oak planning area, and the potentially significant impact on water supplies would be substantially reduced in the City of Santa Cruz water service area as the reduced number of housing units would fall well within the projections in the City's UWMP. Thus, the potential impact within the City of Santa Cruz water service area would be reduced to a less-than-significant level under Alternative 2-Reduced Growth. While the City forecasts a shortfall of approximately two percent during the fifth year of a multi-year drought, the City considers this negligible and would not prevent the City from providing service to its customers. Future housing unit estimates in the SqCWD under Alternative 2 are estimated to be similar or slightly less than estimates for

Alternative 1-No Project. Therefore, impacts to SqCWD water supplies would be reduced, but not to a less-than-significant level as the amount of estimated development may approach or exceed forecasts in the SqCWD’s 2020 UWMP. Therefore, potentially significant project and cumulative impacts related to availability of water supplies under Alternative 2-Reduced Growth could be substantially reduced due to reduction of impact in the City of Santa Cruz water service area, but not avoided or reduced to a less-than significant level due to potential impacts in the SqCWD service area.

Other Impacts

Other less-than-significant impacts identified for the proposed project would be the same or slightly reduced with Alternative 2-Reduced Growth as there would be continued development under the General Plan/LCP and SCCC regulations, but at a potentially lesser extent than with the proposed project. This alternative would not result in new significant impacts not otherwise identified as part of the proposed project.

6.4.2.3 Ability to Meet Project Objectives

Table 6-4 at the end of Section 6.4 summarizes and compares how the proposed project and evaluated alternatives meet project objectives. Alternative 2-Reduced Growth would fully meet 13 of the 16 project objectives, and partially meets three project objectives – 1, 6, and 9. Due to reduced growth estimated under this alternative, Alternative 2-Reduced Growth would potentially result in less sustainable development (#1 and 6) than achieved with the proposed project and would not achieve reduced greenhouse gas (GHG) emissions (#9) to the same extent as the proposed project.

6.4.3 Alternative 3: Reduced Project

6.4.3.1 Description

Alternative 3 includes elimination of project components that would lead to reduced development potential. The first would be elimination of proposed General Plan/LCP Land Use and zoning map changes for 10 parcels in the USL: nine along Portola Drive and the Thurber Lane/Soquel Drive parcel. Existing commercial land use and zone designations for these parcels would be retained.

The second component would modify or eliminate proposed policies and regulations that would allow public/quasi-public uses on agricultural lands. The proposed policy and regulatory amendments add “interim or permanent public/quasi-public uses that the County has determined to be of significant benefit to the public health, safety and welfare and for which mitigation will be provided as feasible,” and amendments to facilitate the location of such essential facilities, while addressing the protection of agricultural resources, are included in several policies. The policy and regulatory amendments that allow the potential for public/quasi-public uses would be modified or eliminated under this alternative, including ARC-1.1.7, 1.1.11, 1.2.1, 1.3.1 and SCCC section 13.10.312 to remove these uses. Existing policies and regulations retained governing permitted uses on agricultural land with regard to public/quasi-public facilities. Alternative 3 retains proposed policies and regulations that would allow expanded agricultural support uses ancillary to an agricultural use on commercial agricultural lands,

including agricultural service establishments and agricultural research and development facilities, but with specified measures for siting and minimizing conversion.

6.4.3.2 Impact Analysis

Agricultural Resources

Impacts related to conversion of Farmland of Statewide Importance, including prime agricultural lands, would not be eliminated, but may be slightly reduced with Alternative 3-Reduced Development due to elimination of policy and regulatory amendments that would allow public/quasi-public uses on commercial agricultural lands. Policy and regulatory amendments that would allow agricultural support services on agricultural lands, however, would continue to be included in the Sustainability Update. Therefore, Alternative 3-Reduced Project would result in a slight reduction in the severity of the impact, but would not reduce the impact to a less-than significant level. Mitigation Measure AGR-1 would not be required as it pertains to public/quasi-public uses on agricultural land that is eliminated under this alternative.

Biological Resources

A potentially significant impact to riparian and sensitive habitat was identified with potential future development on one parcel located at Thurber Lane/Soquel Drive if the existing ephemeral stream were converted to an underground storm drain. Under Alternative 3-Reduced Project, the property land use and zone designations would not change, and existing neighborhood commercial and office designations would remain in place. Thus, future development could occur on the site, but with existing commercial land use and zone district designations. Therefore, future development under Alternative 3 could also include potential impacts to the existing ephemeral stream and associated sensitive riparian and aquatic habitats on the property if the stream were converted to an underground storm drain. Thus, Alternative 3-Reduced Project would not eliminate or reduce the significance of this impact, and Mitigation BIO-1 would be required as with the proposed project to provide a restoration plan should the stream be altered as part of future development.

Cultural Resources

Alternative 3-Reduced Project could result in a slightly lower amount of total development than estimated for the proposed project, but greater than what is estimated for Alternatives 1 or 2. As with the proposed project, there is potential for redevelopment of sites that have structures older than 50 years in age, which would require review to determine whether the structure would be considered a historical resource, and if so, to analyze potential significant impacts to historical resources and mitigate any impacts to the extent feasible. Through compliance with federal, state, and local regulations, and implementation of mitigation measures identified through project-level CEQA reviews and County-required historical evaluations for any structure over 50 years old, the potential for adverse effects to historical resources would be identified, and mitigation would be required if a significant impact were identified. Nonetheless, preservation, reuse, maintenance, and/or avoidance of historical

resources may not always be feasible, especially with potential redevelopment and intensification of uses in the USL, and recordation of a significant historical resource, alone, would not constitute adequate mitigation for a substantial adverse change to that resource. Mitigation Measures CUL-1 and CUL-2 would continue to be required as with the proposed project. Because Alternative 3-Reduced Project could result in future development at an amount similar to, though slightly reduced, than the proposed project, potential indirect impacts to historical resources under the Alternative 3 would not be reduced to a less-than-significant level.

Transportation-VMT

VMT under Alternative 3-Reduced Project would be similar to or slightly worse than with the proposed project due to elimination of land use map changes to urban parcels that would have otherwise supported intensified residential development in proximity to transit, bicycle, and pedestrian facilities. As discussed in Section 4.15, Transportation, the proposed project would result in a reduced VMT for residential VMT per capita, VMT per office/service employee, and VMT per employee for other employment land uses from existing conditions, but would not meet the County's VMT threshold, resulting in a significant project and cumulative impact. Mitigation Measures TRA-1 and TRA-2 would continue to be warranted under this alternative. However, the VMT project and cumulative impacts under Alternative 3-Reduced Project would be similar to or slightly worse than the proposed project, and the significant project and cumulative impact would not be reduced to a less-than-significant level as the County's threshold is expected to continue to be exceeded under this alternative.

Utilities-Water Service

The EIR concludes that the proposed project may indirectly result in demand that exceeds available water supplies in the City of Santa Cruz and SqCWD, which may be significant and unavoidable, depending on the actual amount and timing of future development that occurs in the county and the City of Capitola that also is located in the service area of these two water purveyors. Under Alternative 3-Reduced Project, it is estimated that future housing development within the Live Oak planning area, which is served by the City of Santa Cruz, would be reduced by approximately 400 units due to elimination of land use and zoning map changes to 10 parcels, although redevelopment with intensified commercial uses could occur with existing land use and zone designations. Therefore, the potentially significant impact on availability of water supplies could be potentially reduced in the City of Santa Cruz water service area as the reduced number of housing units would fall within the projections in the City's UWMP. Thus, the potential impact within the City of Santa Cruz water service area could potentially be reduced to a less-than-significant level under Alternative 3-Reduced Project. While the City forecasts a shortfall of approximately two percent during the fifth year of a multi-year drought, the City considers this negligible and would not prevent the City from providing service to its customers.

Future housing unit estimates in the SqCWD under Alternative 3 would be the same as with the proposed project. Therefore, potential impacts to SqCWD water supplies would be the same as the proposed project. Therefore, potentially significant project and cumulative impacts related to

availability of water supplies under Alternative 3-Reduced Project could be substantially reduced due to reduction of impact in the City of Santa Cruz, but not avoided or reduced to a less-than significant level due to potential impacts in the SqCWD service area.

Other Impacts

Other less-than-significant impacts identified for the proposed project would be the same or slightly reduced with Alternative 3-Reduced Project as there would be continued development under the General Plan/LCP and SCCC regulations, but at a potentially lesser extent than with the proposed project. This alternative would not result in new significant impacts not otherwise identified as part of the proposed project.

6.4.3.3 Ability to Meet Project Objectives

Table 6-4 summarizes and compares how the proposed project and evaluated alternatives meet project objectives. Alternative 3-Reduced Project would fully meet 9 of the 16 project objectives, and would partially meet the other seven objectives. Due to elimination of land use designation changes on 10 parcels in the USL that would have supported high-density, intensified residential development, Alternative 3 would only partially meet project objectives related to sustainable development (1), housing (5), neighborhood vitality (6), reduction of GHG emissions (9), support of health care and medical facilities on Soquel Drive (11), implementation of the Pleasure Point vision (13), and support for parcel land use and zone map changes (14).

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (section 15126.6[a]) requires that an EIR's analysis of alternatives identify the "environmentally superior alternative" among all of those considered. In addition, section 15126.6(e)(2) states that if the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives. Furthermore, Public Resources Code sections 21002 and 21081 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 economic, legal, social, technological, or other conditions make such mitigation measures or alternatives infeasible.

Table 6-5 presents a comparison of project impacts between the proposed project and the alternatives. Alternative 1-No Project would reduce impacts related to farmland conversion (AGR-1) to a less-than-significant level, and also reduce impacts related to historical resources (CULT-1) and water supplies (UTL-1 and cumulative water), but not to a less-than-significant level. Impacts to sensitive habitats (BIO-2B) would remain similar to the proposed project, and significant transportation project and cumulative impacts related to VMT would increase in severity under Alternative 1-No Project. Additionally, Alternative 1 would meet or partially meet only four of the 16 project objectives.

Table 6-4. Ability of Alternatives to Meet Project Objectives

Objective	Ability to Meet Objective			
	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Reduced Growth	Alternative 3 Reduced Project
1. Sustainable Development	Yes	No	Partially	Partially
2. Agriculture	Yes	Partially	Yes	Yes
3. Conservation and Open Space	Yes	Yes	Yes	Yes
4. Multimodal Transportation Network	Yes	No	Yes	Yes
5. Housing	Yes	Partially	Yes	Partially
6. Neighborhood Vitality and Services	Yes	No	Partially	Partially
7. High-Quality Design	Yes	No	Yes	Yes
8. Economic Vitality	Yes	Partially	Yes	Yes
9. Reduction of GHG Emissions	Yes	No	Partially	Partially
10. Healthy Communities	Yes	No	Yes	Yes
11. Healthcare and Medical Facilities	Yes	No	Yes	Partially
12. Environmental Justice	Yes	No	Yes	Yes
13. Pleasure Point and Portola Corridor	Yes	No	Yes	Partially
14. Update Zoning Regulations and Permitting	Yes	No	Yes	Yes
15. Align with State Law and Regional Plans	Yes	No	Yes	Yes
16. Parcel Changes	Yes	No	Yes	Partially

Under Alternative 2-Reduced Growth, all significant impacts would be reduced, but not to a less-than-significant level, except for BIO-2D, which would remain similar to the proposed project. All project objectives would be met under Alternative 2, except for three that would be partially met. Under Alternative 3-Reduced Project, one impact (AGR-1) would be reduced, but not to a less-than-significant level. All other identified significant impacts would remain similar to the proposed project, except the project and cumulative impact related to VMT (TRA-1), which could be slightly more severe than the proposed project. Alternative 3 also would fully meet fewer project objectives than Alternative 2 or the proposed project.

Overall, of the alternatives considered, Alternative 2 would reduce the severity of more identified significant impacts than the other alternatives reviewed and also attain most of the project objectives. Therefore, Alternative 2 is considered the environmentally superior alternative of the CEQA alternatives reviewed.

Table 6-5. Comparison of Significant Impacts from the Alternatives

Impact	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Growth	Alternative 3 Reduced Project
AGR-1: Important Farmland Conversion	SU	LS	SU↓	SU↓
BIO-12D: Sensitive Habitat Impacts (Thurber Lane/Soquel Drive Parcel)	SU	SU≈	SU≈	SU≈
CUL-1: Historical Resources	SU	SU↓	SU↓	SU≈
UTL-1: Water Supplies (City of Santa Cruz, SqCWD)	SU	SU↓	SU↓	SU≈
Cumulative Water Supplies (City of Santa Cruz, SqCWD)	SU	SU↓	SU↓	SU≈
TRA-1: Transportation-VMT	SU	SU↑	SU↓	SU↑
Cumulative Transportation-VMT	SU	SU↑	SU↓	SU↑

Notes: NI = no impact; LS = less than significant; SU = significant and unavoidable; ↑ = greater; ↓ = lesser; ≈ = similar.

6.6 REFERENCES

County of Santa Cruz. 2020. Sustainability Policy and Regulatory Update EIR. Documentation of Preferred Scenario Growth Assumptions. October 29, 2020.