



U.S. Department of Housing and Urban  
Development

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# Environmental Assessment

## Determinations and Compliance Findings for HUD-assisted Projects

### 24 CFR Part 58

#### Project Information

**Project Name:** 415 Natural Bridges Drive Project

**Responsible Entity:** City of Santa Cruz

**Grant Recipient** (if different than Responsible Entity): Housing Authority of the County of Santa Cruz

**State/Local Identifier:**

**Preparer:** Clara Stanger, City of Santa Cruz Planning and Community Development

**Certifying Officer Name and Title:** Jessica de Wit, City of Santa Cruz Housing and Community Development Division Manager  
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**Consultant** (if applicable): Stephanie Strelow, Dudek  
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## **Project Location:**

The 415 Natural Bridges Drive Project (referred throughout this Environmental Assessment as the proposed project or project) is located at 415 Natural Bridges Drive in Santa Cruz, California (City); refer to Attachment 1. The approximately 0.35-acre (15,305-square-foot) project site is located north of Delaware Avenue in the western portion of the City. The project site is currently split between two parcels (APNs 003-011-06 and 003-011-10) and is located within the coastal zone, approximately 0.60-mile north of the Pacific Ocean. The project area is characterized by a mix of office, industrial, residential and open space uses.

The project site is bordered by developed commercial uses on north, east, and west. Adjacent commercial uses include office buildings directly to the north and east and a fitness club/gymnasium directly to the west. The project site is also bordered by an inactive rail line and a segment of the Monterey Bay Sanctuary Scenic Trail is located adjacent to the rail line to the southeast of the project site. Property to the south of the rail line and project site is owned by the University of California Santa Cruz that is used for parking lot and tennis courts that serve an existing office building. Natural Bridges State Beach and Visitor Center is approximately 0.25-miles south of the site in an area characterized by a residential development and open space amenities including parking, trails, and beach access.

## **Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:**

The proposed project consists of a Lot Line Adjustment, Planned Development Permit, Design Permit, and Coastal Permit to transfer land to/from APN 003-011-10 and construct a 100% affordable, 20-unit Single Room Occupancy (SRO) project. The project requests a variation to allowed uses in the R-L zone to allow an SRO use and variations to development standards for building height, side yard setback, and number of required parking spaces that was reviewed and approved through the Planned Development Permit. This project involves the removal of four heritage trees. The project would be available to very-low income households; the project would be managed by the Housing Authority of the County of Santa Cruz.

As shown on Attachment 2, the proposed site plan includes a rectangular-shaped building. The proposed building would be three levels and cover 10,519 gross square feet. The 20 living units would occupy a total of 6,791 square feet, and residential units would be located on all three levels. The three-story building is proposed to be 36 feet high from grade to top of the third-floor parapet. Common areas include a lobby, common area room, laundry room, and third floor deck, would occupy a total of 720 square feet. The building would also have 20 private storage units for its residents.

The proposed lot line adjustment would transfer 4,054 square feet of property from APN 003-011-10 to the west of the project site that is approximately 2.8 acres in size. This would result in the project being located on a 15,423-square foot lot; see Attachment 3 for the proposed lot line adjustment. The land area subject to the lot line adjustment is currently used for parking and would continue to be used for parking as part of the proposed project.

Access to the project site would be provided from a new driveway running along the southern perimeter of the site to and from Natural Bridges Drive. A total of 12 parking spaces are proposed for the development. Five spaces would be compact stalls, six standard stalls, and one would be ADA accessible. The project includes frontage improvements along Natural Bridges Drive per City standards, including sidewalks.

The project would be enclosed by a new six-foot wall or fence around the northern, southern, and eastern perimeters of site. Bicycle parking for residents would be made available through the 20 private storage units within the building. Five additional bicycle parking spaces for residents and visitors would be made available via a new outdoor bicycle rack. Resident access to and from the building would be provided

through new paved sidewalks along the northern and southern portions of the site to a main building entrance and side building entrance.

The project would involve the removal of four heritage trees, as defined by the City's Heritage Tree Ordinance. The project would be landscaped with three new myrtle trees along the site's Natural Bridges Drive street frontage. Several other landscape plants and groundcover are proposed along the perimeter of project's parking lot and within the project's front yard setback area. The project would be subject to provisions of the City's Water Efficient Landscape Ordinance (WELO), per Chapter 16.16 of the City's Municipal Code.

The project would create a total 10,392 square feet of paved impervious surface. Stormwater would be controlled with a new storm drain system and several Low Impact Development (LID) methods outlined in the project's Stormwater Management Plan. These include limiting potential disturbance to natural drainage features, limiting clearing and grading of native vegetation, and implementing Best Management Practices (BMPs) that would minimize stormwater runoff. The project proposes to install a bioretention mechanical filtration system that would be located in the front yard setback area. The project site is designed so that stormwater would collect into this system. Stormwater would be filtered through this system before it is discharged from the site.

Construction would be expected to occur over approximately one year with excavation of the site taking approximately one month. The net earth material would be balanced on site; approximately 150 cubic yards (cy) of earth material would be cut from the site and approximately 150 cy of earth material would be filled. Therefore, there would be no excess excavated earth material no hauling of earth material on or off site is anticipated.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

As demand increases for City services and the City's population increases, the need for additional housing and access to government services has also increased.

The proposed project's objectives are as follows:

- Create new affordable, safe, attractive and service-enriched residences to very-low-income individuals.
- Create a living community that fits into and improves the existing neighborhood in style, texture, scale, and relation to its surroundings.

**Existing Conditions and Trends** [24 CFR 58.40(a)]:

The project site is currently split between two parcels (APNs 003-011-06 and 003-011-10). Currently, the eastern, larger lot (APN 003-011-06) is undeveloped and contains grass and six trees; the western lot (APN 003-011-10) currently is developed with a fitness club and gymnasium. A small portion of the western lot is proposed to be included in the project site and currently is paved and used for parking.

The project is relatively flat with existing onsite elevations varying between approximately 73 feet above mean sea level (MSL) on the northwest portion of the site to approximately 71 feet MSL on the southeast portion of the site. Slopes on site generally vary between 0.5% and 1% from northwest to southeast.

As noted above, a total of six existing trees of various conditions are located on the project site, of which four are heritage trees pursuant to City regulations (Maureen Hamb Professional Consulting Services 2021):

- 3 arcadia (*Acacia baileyana*)
- 1 deodar cedar (*Cedrus deodara*)

- 1 coast live oak (*Quercus agrifolia*)
- 1 tulip (*Liriodendron tulipifera*)

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
CFDA 14.871	HUD Section 8 Housing Choice Voucher Program – Project Based Vouchers	\$9,086,400

**Estimated Total HUD Funded Amount:** \$9,086,400

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$15,086,400, including construction costs

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not adjacent to any military or municipal airports. The nearest municipal airport is the Watsonville Municipal Airport, approximately 15 miles east of the project site (see Attachment 4 and Environmental Review Record [ERR] 1). The nearest military airport is Travis Air Force Base, approximately 115 miles northeast of the project site.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Coastal Barrier Resources Act does not apply to this project because no coastal barrier resources protected under this policy occur in California (see Attachment 5). In addition, because the proposed residential project is approximately 0.6 miles from the coast, it is unlikely to affect coastal resources (USFWS 2019).
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map indicates that the project site does not occur within a floodplain. According to the map, the project site

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		is in Zone X, an area outside of the Special Flood Management Areas (FEMA 2017) (FIRM Panel 06087C0333F effective September 2017; see Attachment 6 and ERR 2).
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project falls under the jurisdiction of the Monterey Bay Air Resources District (MBARD) and is within the North Central Coast Air Basin (NCCAB).  According to MBARD, under the Federal Clean Air Act, the NCCAB is designated a maintenance area for the federal one-hour ozone national ambient air quality standards (AAQS). The NCCAB was redesignated from a moderate nonattainment area to a maintenance area in 1997 after meeting the federal one-hour ozone standard in 1990. The NCCAB is also designated as an attainment area for the federal eight-hour ozone AAQS. Furthermore, according to the MBARD CEQA Guidelines, as of June 2005, the NCCAB met all federal air quality standards. As a result, it is no longer subject to federal conformity requirements (MBARD 2008) (see ERR 3).
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	No adverse impacts to California’s designated coastal zones would occur as a result of the proposed project. The project site is located within the coastal zone (CCC 2019), approximately 0.60-mile north of the Pacific Ocean as defined by the California Coastal Act (Public Resources Code, Division 20, Section 3000 et seq.). The project site also is located in the Coastal Appeal area of the Coastal Zone Overlay zone district and the Shoreline Protection Overlay Zone District, which seek to ensure that development protects coastal and environmental resources within the City and to provide the means of carrying out policies of the Coastal Act and City’s certified Local Coastal Program (LCP).  Pursuant to the California Coastal Act, the City has a LCP that was certified by the California

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>Coastal Commission (CCC). The LCP consists of a land use plan, implementing ordinances and maps applicable to the coastal zone portions of the City, and applies to all private and public projects located within the coastal zone. The purpose of CA overlay district</p> <p>Per sections 24.10.2400 and 24.10.2500 of the City’s Municipal Code, the project is subject to a City Coastal Permit. For Coastal Permit approval, the City’s approving authority is required to make findings pursuant to section 24.10.2430 of the Municipal Code related to grading, erosion control, coastal hazards, public views, shoreline access, and more generally, the goals of the LCP.</p> <p>The Santa Cruz City Council approved the Coastal Permit on April 26, 2022, and the approval was not appealed to the California Coastal Commission. The City Council made findings related to the project’s compliance with the Coastal Zone Overlay to approve the Coastal Permit as summarized below, and the project is subject to approved Conditions of Approval (see Attachment 7 and ERR 4).</p>
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>A Phase I Environmental Site Assessment (ESA) of the subject property was performed by Dudek in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-21) (ASTM 2021). (See Attachment 8 and ERR 5). The ESA did not reveal evidence of recognized environmental conditions (RECs), historical RECs, controlled RECs, or vapor encroachment conditions (VECs) in connection with the subject property.</p> <p>A review of Environmental Database Report (EDR) records for the project site did not reveal any underground storage tanks or aboveground storage tanks for the parcel. The Phase I ESA notes that the project site is listed in the</p>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>Hazardous Waste Tracking System (HWTS) and HAZNET databases. Both the HWTS and HAWNET listings are associated with the removal and transport of asbestos-containing material. In 2015, 2.07 tons of asbestos-containing material was removed from the subject property and disposed of at a landfill. The Phase I ESA concludes that because the asbestos-containing material was removed and is inert, it is unlikely that that this listing has adversely impacted the subject property. Underground storage tanks and aboveground storage tanks were also not observed during the site reconnaissance. (Dudek 2022) (see Attachment 8 and ERR 5).</p>
<p><b>Endangered Species</b></p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Due to the urban and commercial setting surrounding the project site, no federally listed special-status plant or wildlife species are expected to be present on site. The project site is mostly undeveloped and consists of non-native grass and six trees. The western portion of the project site is currently developed with a paved surface parking lot. According to maps developed for the City’s General Plan 2030 and included in the General Plan EIR, the project site is not located within or adjacent to a sensitive habitat area. Areas of riparian and wetland habitat associated with Moore Creek and Antonelli Pond are located approximately 300 and 500 feet, respectively to the west and southwest of the site; however, no riparian habitat is located on or adjacent to the project site. The project site is not located within in or adjacent to the management area or riparian and development setback areas for Moore Creek established in the City-wide Creeks and Wetlands Management Plan.</p> <p>A biological resources technical memorandum was prepared by Dudek that provides information on the occurrence of, and potential impacts to, federally-listed species, as a result of implementation the project. The memorandum summarizes results of literature and database search using the following sources: U.S. Fish</p>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) Trust Resource Report. Additionally, Dudek reviewed Google Earth aerial and ground-level imagery of the project site and conducted a site visit to assess the area on September 1, 2022.</p> <p>According to USFWS IPaC database, 17 species (4 plants and 13 animals) classified as endangered or threatened by the were identified as possibly occurring in the project area, consisting of six bird species, one reptile species, three amphibian species, one fish species, and two insect species, and four flower plant species.</p> <p>Although the general habitat ranges of these 17 species may overlap with the project location, according to the IPaC database and site reconnaissance, their critical habitat areas do not intersect with the project site (USFWS 2022a).</p> <p>Accordingly, the technical memorandum concluded that the project will have no effect on federally-listed plant or animal species because the project site is: (1) located outside of the species known range; or (2) does not support suitable habitat conditions for such species. Therefore, the proposed project will have no effect on critical habitat as no critical habitat has been designated in the location of the project site; proposed project would not impact wildlife movement, migration, or nursery sites (see Attachment 9 and ERR 6).</p>
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>Explosive or flammable hazardous materials would not be present at the project site. The Phase I ESA did not identify any hazardous materials or petroleum products on the project site.</p> <p>According to the Phase I ESA, observations of the properties adjoining the project site did not find any potential aboveground sources of contamination that could impact the project site. (See Attachment 8). Therefore, the proposed development would not expose residents or the surrounding community to dangerous explosive or flammable hazards (Dudek 2022)</p>



<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed development is in an urban setting on land designated as Urban and Built-Up Land by the California Department of Conservation (DOC 2016). The project site does not contain prime farmland or other agricultural lands as mapped on the State Farmland Mapping and Monitoring Program. The site is not designated for agricultural uses in the City’s General Plan and is not located adjacent to agricultural lands. For these reasons, the project would not threaten existing farmlands and complies with the Farmland Protection Policy Act (see Attachment 10).
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Floodplain management would not be adversely impacted by the proposed project because the project site does not occur on a floodplain or floodway. According to the FEMA Flood Insurance Rate Map, the project site does not occur on a floodplain; the project site is in Zone X, an area outside of the Special Flood Management Areas (FEMA 2017) (FIRM Panel 06087C0333F effective September 2017;(see Attachment 6 and ERR 2).
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	According to maps developed for the City’s General Plan 2030 and included in the General Plan EIR, the project site is not located within a designated historic district (City of Santa Cruz 2012a and 2012b). The project site is currently vacant and undeveloped and the portion that would be added via a lot line adjustment is currently developed with a surface parking lot and contains no structures. A field survey conducted as part of the project’s archaeological investigation did not result in the finding of intact historical deposits.  The California State Historic Preservation Office was consulted in October 2022 to identify the presence of any known historical or cultural resources on the project site. Pursuant to 36 Code of Federal Regulations (CFR) 800.4(d), the State Historic Preservation Office did not find evidence that any historic resources would be impacted by the proposed development.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>Furthermore, as required by City of Santa Cruz regulations, construction activities would cease and an archaeologist would be contacted in the event that historic or cultural resources were discovered on the project site during ground-disturbing construction activities. Section 24.12.430 of the City’s Municipal Code sets forth the procedure to follow in the event that previously unknown prehistoric or cultural features are discovered during construction. Under provisions of this Code section, work shall be halted within 100 feet of the find and the Planning Director shall be immediately notified to determine the appropriate course of action, including implementation of potential mitigation measures. Additionally, the County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be Native American.</p> <p>For these reasons, the project would not result in impacts to a historical resource.</p> <p>Pursuant to Public Resources Code Section 21080.3.1(c), tribes that are traditionally and culturally affiliated with the project site were consulted (see Attachment 11, which includes tribal correspondence and archaeological report with records search, and ERR 7).</p>
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<b>Construction Noise.</b>  A temporary increase in noise levels would be expected during the construction phase of the project. Noise would be generated by construction equipment and/or the delivery of materials, among other activities. Increases in ambient noise levels would be restricted to daytime hours. Construction noise would not be considered significant given the short-term and temporary nature of construction activities, and intermittent noise levels would vary throughout a given day depending on the construction activity.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p><b>Operational Noise.</b></p> <p>The project site is located approximately 340 feet south of Mission Street and approximately 770 feet south of State Route 1 (Highway 1/Cabrillo Highway). A former Southern Pacific Railroad rail line is located south of the project site, but the rail line is inactive and no active rail lines are located in the project vicinity. The nearest airport is Watsonville Municipal Airport, located approximately 15 miles to the east. Thus, the primary noise source in the project vicinity is roadway traffic noise.</p> <p>Exterior uses with a day night average sound level (DNL) of 65 dBA or less are considered normally acceptable according to HUD’s noise standards found in 24 CFR Part 51, Subpart B. Using HUD’s Day/Night Noise Level Calculator Electronic Assessment Tool, the project’s on-site noise level was determined to be lower than the HUD noise standard of 65 dBA DNL/Ldn.</p> <p>The HUD day/night noise level model was run with the project site plan (Attachment 12), as well as published Average Daily Trip traffic volumes from the Santa Cruz County Regional Transportation Committee for Natural Bridges Drive, Mission Street and Highway 1/Cabrillo Highway (projected out to Year 2034 at an assumed annual increase rate of 1 percent per year), and speed limit information and building setback measurements from online aerial imagery (see Attachment 12 and ERR 8).</p> <p>The model run predicted 24-hour noise level at the project site’s façade as 61 dBA DNL/Ldn. Thus, the noise level at the project site would be less than the HUD exterior noise standard of 65 dBA DNL and falls into the “normally acceptable” category.</p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The project site is not on or adjacent to any sole source aquifers. The nearest sole source aquifer is the Santa Margarita Aquifer, which is approximately 3.5 miles northeast of the site (EPA 2020) (see Attachment 13)</p>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The National Wetlands Inventory map regulated by USFWS was used to determine the presence of wetlands on the project site. No wetlands were found on the project site. The nearest wetland resources, according to the National Wetlands Inventory map is the Antonelli Pond, approximately 500 feet southwest project site. The wetland resource is designated as a freshwater pond on according to the National Wetland Inventory map. (USFWS 2022a) (see Attachment 14 and ERR 9).
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site does not contain any rivers protected under the Wild and Scenic Rivers Act. Merced River, approximately 115 miles northeast of the project site, is the closest Wild and Scenic waterway to the project site (U.S. National Park Service 2021) (see Attachment 15 and ERR 10).
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The proposed project would have a beneficial impact to populations protected by environmental justice by providing affordable housing to very-low income residents. The proposed development would consist of 100% affordable housing.</p> <p>Development of the vacant project site would provide 20 SROs to members of the community most in need of housing. Residents of the affordable housing complex would benefit from being in proximity to transportation corridors and activity centers which would for provide opportunity for employment, social engagement, and commerce.</p> <p>The project’s adverse impacts identified above would be limited to the project area and mitigation measures would be implemented to avoid, minimize, or reduce impacts (<b>Mitigation Measure 1</b>). No disproportionate adverse impacts would occur to residents or community members. Therefore, the proposed project would be compliant with Executive Order 12898 (ERR 11).</p>

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project site is designated Low Medium Density Residential (LM) in the City’s General Plan 2030 and is zoned Multiple Residence – Low Density with Coastal Zone and Shoreline Protection Overlays (R-L/CZ-O/SP-O). The proposed residential project is consistent with the General Plan land use designation. According to the General Plan, this designation is intended to provide “...moderately higher densities in areas with a mix of single-family and multifamily residential uses. Accommodates a variety of residential building types that can fit within a single-family neighborhood, including low-rise apartments, condominiums, and townhomes.” Although the project’s General Plan Land Use designation of Low Medium Density Residential prescribes a density limitation of 10.1 dwelling units per acre (du/acre) to 20 du/acre, the project is not subject to this maximum density limitation because General Plan Land Use Policy LU3.8 allows for certain residential uses (including SROs) to exceed maximum density limitations. Because the proposed project involves the development of exclusively SROs, the project would not be subject to maximum density limitations; therefore, the proposed project’s residential densities would be considered consistent with the City’s General Plan and General Plan 2030 EIR. For these reasons, the proposed project would be in conformance with the City’s zoning and General Plan land use designations.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p>According to maps developed as part of the City’s General Plan 2030 and included in the General Plan EIR, the project site consists of Watsonville loam soils with 0 to 2 percent slopes (City of Santa Cruz 2012a). As described in the General Plan EIR, erosion potential for this soil profile is not high (City of Santa Cruz 2012b).</p> <p>Also, according to the City’s General Plan, the project site is not located in an area of steep slopes.</p> <p>Potential soil suitability issues specific to the project site and development would be further addressed through compliance with state and local regulations, including the California Building Code requirements and Section 24.14.070 of the City’s Municipal Code (requirement for geotechnical investigations), which would ensure the project is built and designed to prevent structural damages based on design in accordance with recommendations of project-specific geotechnical investigations.</p> <p>The project would result in an overall increase of 10,392 square feet of impervious surface. On-site stormwater retention and filtration is planned through engineered control measures detailed in the project’s stormwater control and management plans. Specifically, the project proposes to install a bioretention mechanical filtration system that would be located in the front yard setback area. The project site is designed so that stormwater would collect into this system. Stormwater would be filtered through this system before it is discharged from the site.</p> <p>The stormwater management plan is designed so that the project would not generate a flow of stormwater that would exceed the capacity of storm water facilities, or result in substantial erosion. Furthermore, the project’s stormwater would be required to be maintained at pre-development runoff levels in accordance with the City’s General Plan and requirements. Section 24.14.050 of the City’s Municipal Code requires preparation of a drainage plan. Pursuant to this plan, drainage improvements would be required to be designed in accordance with City standards and Public Works requirements in order to meet water quality standards and maintain pre-project runoff levels. Implementation of BMPs identified in the project-specific stormwater plan in accordance with requirements of the City’s Municipal Code would be required through adherence of <b>Mitigation Measure 1.</b></p>
Hazards and Nuisances including Site Safety and Noise		<p><b>Hazardous Materials.</b> A Phase I ESA of the project site was performed by Dudek. The ESA did not identify evidence of recognized environmental conditions (RECs), historical RECs, controlled RECs, or vapor encroachment conditions (VECs) in connection with the subject property. Furthermore, a review of</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>EDR records for the project site did not identify any underground storage tanks or aboveground storage tanks for the parcel (See Attachment 8).</p> <p><b>Site Safety.</b> The project would be constructed consistent with current City of Santa Cruz building and construction requirements related to site safety. The site has no known hazards that would affect site safety during construction. No impacts related to hazards, nuisances, or site safety are anticipated.</p> <p><b>Noise.</b> A temporary increase in noise levels would be expected during the construction phase of the project. Noise would be generated by construction equipment and the delivery of materials, among other activities. Increases in ambient noise levels would be restricted to daytime hours and would remain within applicable thresholds set by the City of Santa Cruz. Noise increases would occur during daylight hours, with no adverse impacts anticipated.</p> <p>Operational noise sources would primarily include project-generated traffic. However, based on the relatively small size of the proposed project, only minimal increases in noise would be expected. Operational noise would comply with the City of Santa Cruz’s General Plan goals and policies and Municipal Code.</p> <p>The City’s General Plan includes goals, policies and actions that set forth measures to avoid and minimize adverse impacts of increased noise resulting from construction or operation of development projects (HZ3.1.1,3.1.2, 3.1.3, and 3.1.5) (City of Santa Cruz 2012a). Section 9.36.010 of the City’s Municipal Code prohibits offensive noise between the hours of 10 PM and 8 AM and Section 9.36.020 prohibits unreasonably disturbing noises. Furthermore, Section 24.14.260 prohibits increases of sound levels above five dBA above the local ambient on a residential property. These regulations are intended to prevent increases in ambient noise levels and would be considered uniformly applied regulations to which the proposed project would be subject to compliance.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Energy Consumption	2	The project would be subject to approval of building permits that meet the California Building Code and City Green Building Code requirements, as well as compliance with City requirements for water conservation fixtures and features, including drought-resistant landscaping. These measures are consistent with those recommended for residential uses in the City's adopted Climate Action Plan related to building and energy efficiency and water conservation. Additionally, Santa Cruz residents are enrolled in Central Coast Community Energy electricity service, which supplies electricity generated from hydropower, solar and wind, which are renewable resources.
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	The proposed project has the potential to create temporary employment opportunities during the construction phase. The project would not have an on-site manager or supporting social services.
Demographic Character Changes, Displacement	1	<p>The project site consists of an undeveloped area and parking lot; therefore, the proposed project would not have an adverse impact on community character or result in the displacement of existing businesses or individuals because the project would occur on land that is currently vacant.</p> <p>The 0.35-acre project site would be developed, such that community character would remain similar. The proposed project is consistent with the City's General Plan land use designation of Low Medium Density Residential. Furthermore, increasing affordable housing units supports the housing priorities detailed in the Housing Element of the City's General Plan. As a result, the proposed project would have a positive impact on community character and would remain compliant with existing land use designations.</p>
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	<p>Negative impacts on educational facilities in Santa Cruz are not foreseen because the target population for the proposed project does not include families with children. The project proponent would also be required to pay school impact fees to fund necessary facility expansion and/or additions in conjunction with potential reuse of the former Natural Bridges Elementary School if the City determines it is needed in the future. Given the availability of educational institutions in the area, payment of school impact fees, and the low probability of residents with children, adverse impacts to schools are not anticipated.</p> <p>The project is near multiple educational facilities, including the following:</p> <ul style="list-style-type: none"> <li>• Pacific Collegiate School, approximately 0.1 mile northwest of the project site</li> </ul>



Environmental Assessment Factor	Impact Code	Impact Evaluation
		<ul style="list-style-type: none"> <li>• Natural Bridges High School, approximately 0.5 mile southeast of the project site</li> <li>• Bay View Elementary School, approximately 1.0 mile northeast of the project site</li> <li>• Spring Hill School, approximately 1.3 miles east of the project site</li> <li>• Westlake Elementary School, approximately 1.4 miles north of the project site</li> <li>• Mission Hill Middle School, approximately 1.5 miles northeast of the project site</li> <li>• Santa Cruz High School, approximately 1.5 miles northeast of the project site</li> </ul>
Commercial Facilities	1	<p>No adverse impacts to surrounding commercial facilities are anticipated. The project site is bordered by office, retail, and commercial uses. Businesses occupying nearby commercial retail spaces could experience an increase in business from new residents at the proposed project. Therefore, businesses surrounding the proposed development would not be adversely impacted.</p>
Health Care and Social Services	2	<p>Increases in the local population could increase demand for health care and social services in the community.</p> <p>However, the project site is near multiple health care facilities which would continue to serve the community, including the following:</p> <ul style="list-style-type: none"> <li>• Dignity Health Medical Group, approximately 0.8 mile east of the project site</li> <li>• Dominican Hospital, approximately 4.6 miles northeast of the project site</li> <li>• Kaiser Permanente Santa Cruz, approximately 2.0 miles northeast of the project site</li> <li>• Palo Alto Medical Foundation, approximately 3.7 miles northeast of the project site</li> <li>• Santa Cruz Health Center, approximately 3.2 miles northeast of the project site</li> <li>• Westside Center, approximately 1.2 miles northeast of the project site</li> </ul> <p>Given the availability of health care facilities in the area, adverse impacts are not anticipated.</p>
Solid Waste Disposal / Recycling	2	<p>Because the proposed project does not involve the demolition of existing structures, solid waste generated during the construction phase would be minimal. All generated waste would be properly disposed of and recycled where possible. The amount of solid waste generated by the proposed project during the operational phase would be a fraction of the throughput taken to City's landfill daily. As a result, adverse impacts from</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		solid waste disposal associated with the proposed project are not anticipated.
Waste Water / Sanitary Sewers	2	The project would be served by existing wastewater utilities. Domestic wastewater generated at the subject property would be serviced by the City, which manages the sanitary sewer system at the project site. The project does not include the construction or use of a septic system. The proposed project would not require construction of additional sewage infrastructure. Negative impacts to wastewater systems and sanitary sewers servicing the project site are not anticipated.
Water Supply	2	<p>The project site is located within the service area of the City of Santa Cruz Water Department, which serves an approximate 20-square-mile area. The project would be connected to the City’s public water system and does not include the use of a groundwater well. Therefore, the project would not affect groundwater supplies or recharge or impede sustainable groundwater management.</p> <p>The proposed project would be subject to City requirements for installation of water conservation fixtures and landscaping for new construction. In addition, the project would pay the required “System Development Charge” for the required new service connection. This charge as set forth in Chapter 16.14 of the City’s Municipal Code is intended to mitigate the water supply impacts caused by new development in the City of Santa Cruz water service area, and the funds are used for construction of public water system improvements and conservation programs.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>Increases in the local population could increase demand for public safety services in the community.</p> <p>The project site is in proximity to public safety providers, including the following:</p> <ul style="list-style-type: none"> <li>• Santa Cruz Fire Department Station 3, approximately 0.8 mile east of the project site</li> <li>• Santa Cruz Police Department, approximately 1.8 miles east of the project site</li> <li>• Santa Cruz Fire Department Station 1, approximately 1.9 miles northeast of the project site</li> <li>• Santa Cruz Fire Department Station 2, approximately 2.9 miles northeast of the project site</li> </ul> <p>Given the availability of public safety facilities and services in the area, adverse impacts are not anticipated.</p>
Parks, Open Space and Recreation	2	Increases in the local population could increase demand for parks, open space, and recreation in the community.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>Recreational spaces in proximity to the project site include the following:</p> <ul style="list-style-type: none"> <li>• Monterey Bay Sanctuary Scenic Trail, across the street from the proposed project</li> <li>• Natural Bridges Park and State Beach, approximately 0.3 mile south of the project site</li> <li>• Antonelli Pond Trails, approximately 0.4 miles southeast of the project site</li> <li>• Sergeant Derby Park, approximately 0.4 mile southeast of the project site</li> <li>• Garfield Park, approximately 0.8 mile east of the project site</li> <li>• Michell’s Cove Beach, approximately 1.0 mile southeast of the project site</li> <li>• University Terrace Park, approximately 1.0 mile north of the project site</li> <li>• Trescony Park, approximately 1.1 miles northeast of the project site</li> <li>• Neary Lagoon Park, approximately 1.3 mile east of the project site</li> <li>• Westlake Park, approximately 1.3 miles north of the project site</li> <li>• Lighthouse Field State Beach, approximately 1.45 miles southeast of the project site</li> </ul> <p>Given the availability of parks, open space, and recreation in the area, adverse impacts are not anticipated.</p>
Transportation and Accessibility	2	<p>The local roadway network serving the project site includes State 1 (Highway 1), Mission Street, Natural Bridges Drive, Western Drive, and Delaware Avenue. The proposed project is within walking distance of several bus stops. The Santa Cruz Metro Transit District (METRO) has bus route service along Natural Bridges Drive, Delaware Street, and Western Drive. Local METRO bus stops are located on Natural Bridges Drive immediately in front the project site (Route 20), along the intersection of Natural Bridges Drive and Delaware Avenue (Route 20), and along the intersection of Highway 1 and Western Drive (Routes 40 and 42). Pedestrian and bicycle facilities are located in the area, including the multi-use path along the Santa Cruz Coastal Rail Trail. The project includes five outdoor bicycle racks and indoor bicycle storage for tenants. Natural Bridges Drive is developed with Class II bike lanes and the project vicinity has multi-use paths, transit stops, and City-sponsored bike share program. Considering the size of the development and existing transportation network, the proposed project is not expected to adversely affect transportation or accessibility in the area.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	The project site does not encompass any unique natural features. Federally protected natural resources, such as rivers, wetlands, coastal zones, and endangered species, are not present on the project site or adjacent properties. Therefore, the proposed project would not result in the alteration of water resources that could potentially result in substantial erosion or siltation on or off site, or result in downstream flooding. Groundwater recharge at the project site could be reduced due to an increase in impervious surface, but recharge would still occur in vegetated green spaces on the project site. The project includes on-site stormwater retention and filtration that is planned through engineered control measures detailed in the project's stormwater control and management plans. Specifically, the project proposes to install a bioretention mechanical filtration system that would be located in the front yard setback area. The project site is designed so that stormwater would collect into this system. Stormwater would be filtered through this system before it is discharged from the site.
Vegetation, Wildlife	2	According to the USFWS IPaC database, the ranges of 17 threatened or endangered species overlap with the project site. However, according to the IPaC database, biological site reconnaissance, and biological resource technical memorandum performed for the project, the project site is located outside of critical habitat areas for the endangered or threatened species that have these areas defined. Furthermore, the project site is surrounded by urban and commercial uses. No riparian habitat is located on or adjacent to the project site. The project site is not located within in or adjacent to the management area or riparian and development setback areas established in the City-wide Creeks and Wetlands Management Plan. For these reasons, no species or critical habitat are anticipated to occur at the site, and there would be no impacts to listed species or critical habitat (USFWS 2022a) (see Attachments 9 and 14 and ERR 6).
Other Factors		

**Additional Studies Performed:**

- Federally-listed Species Assessment, 415 Natural Bridges Drive Project, Santa Cruz, California. Prepared by Dudek. September 2022.
- Phase I Environmental Site Assessment, 415 Natural Bridges Drive, Santa Cruz, California. Prepared by Dudek. August 2022.
- Preliminary Archaeological Reconnaissance, 415 Natural Bridges Drive, Santa Cruz, Santa Cruz County, California (APN 003-011-06). Prepared by Patricia Paramoure Archaeological Consulting. May 6, 2021.
- Preliminary Stormwater Control Plan for 415 Natural Bridges Drive, Santa Cruz, California, APN: 003-011-06. Prepared by Ifland Engineers. May 2021.

- Tree Resource Evaluation Project Impact Analysis, 415 Natural Bridges Drive. Prepared by Maureen Hamb Professional Consulting Services. June 2021.

**Field Inspection** (Date and completed by):

- Federally-listed Species Assessment, 415 Natural Bridges Drive, Santa Cruz, California. Completed by Dudek. September 1, 2022.
- Tree Resource Evaluation Project Impact Analysis, 415 Natural Bridges Drive. Completed by Maureen Hamb Professional Consulting Services. June 2021.
- Phase I Environmental Site Assessment 415 Natural Bridges Drive, Santa Cruz, California. Completed by Dudek. August 16, 2022.
- Preliminary Archaeological Reconnaissance, 415 Natural Bridges Drive, Santa Cruz, Santa Cruz County, California (APN 003-011-06). Completed by Patricia Paramoure Archaeological Consulting. May 6, 2021.

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

- CCC (California Coastal Commission). 2019. “Maps – Coastal Zone Boundary: Santa Cruz County.” <https://coastal.ca.gov/maps/czb>.
- City of Santa Cruz. 2012a. *City of Santa Cruz, General Plan 2030*. Adopted June 26, 2012. <https://www.cityofsantacruz.com/government/city-departments/planning-and-community-development/long-range-policy-planning/general-plan>.
- .City of Santa Cruz. 2012b. *City of Santa Cruz General Plan 2030 Final EIR*. Certified June 26, 2012. Dated September 2011. <https://www.cityofsantacruz.com/government/city-departments/planning-and-community-development/long-range-policy-planning/general-plan>.
- DOC (California Department of Conservation). 2016. California Important Farmland Finder. <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- Dudek. 2022. Phase I Environmental Site Assessment, 415 Natural Bridges Drive, Santa Cruz, California. August 2022.
- Maureen Hamb Professional Consulting Services. 2021. *Tree Resource Evaluation Project Impact Analysis, 415 Natural Bridges Drive*. June 2021
- MBARD (Monterey Bay Air Resources District). 2008. CEQA Air Quality Guidelines. <https://www.mbard.org/files/0ce48fe68/CEQA+Guidelines.pdf>.
- .EPA (United States Environmental Protection Agency). 2020. “Sole Source Aquifers for Drinking Water.” Last updated January 14, 2020. Accessed August 2022. <https://www.epa.gov/dwssa>.
- .FEMA (Federal Emergency Management Agency). 2017. “FEMA Flood Map Service Center” <https://msc.fema.gov/portal/search?AddressQuery=415%20natural%20bridges%20santa%20cruz#searchresultsanchor>.
- .USFWS (U.S. Fish and Wildlife Service). 2019. “Coastal Barrier Resources System Mapper.” Updated July 31, 2019. Accessed August 2022. <https://www.fws.gov/cbra/maps/Mapper.html>.

USFWS. 2022a. “Information for Planning and Consultation (IPaC).” Accessed July 2022. <https://ipac.ecosphere.fws.gov/>.

USFWS. 2022b. “National Wetlands Inventory, Surface Waters and Wetlands Map.” Accessed August 2022. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

U.S. National Park Service. 2021. “Interactive map of NPS Wild and Scenic Rivers.” Accessed August 2022. <https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daee0e353142>.

### **List of Permits Obtained:**

- Lot Line Adjustment
- Planned Development Permit
- Design Permit
- Coastal Permit
- Heritage Tree Removal Permit

### **Public Outreach [24 CFR 50.23 & 58.43]:**

The Environmental Assessment will be made available for public review and comment beginning on November 3, 2022 and concluding on November 18, 2022.

### **Cumulative Impact Analysis [24 CFR 58.32]:**

The proposed project would not contribute to a significant cumulative impact under the National Environmental Policy Act because it would consist of an urban development project consistent with the site’s General Plan land use and zoning designations, and would be near existing transit services. State and local planning guidelines encourage the development of urban multifamily housing in areas served by transit and near commercial amenities because this type of development contributes less to cumulative effects on the environment in comparison to development of previously undisturbed sites in more remote locations with fewer transit connections, many of which may contain native vegetation and wildlife species.

### **Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]**

Site identification has proven to be a recurring obstacle in providing affordable housing units. Residential sites available at reasonable cost are limited, and sites that do not meet cost and land use criteria are generally eliminated as alternatives. There is a lack of properties owned by the Housing Authority of the County of Santa Cruz that would be viable candidates for housing. No other build alternatives are analyzed or included in this environmental document.

### **No Action Alternative [24 CFR 58.40(e)]:**

The No Action Alternative would be to not build housing at the project site. There are no benefits to the physical or human environment by not taking the federal action associated with this project. Physical impacts to the environment would occur in urban areas whether units are subsidized with federal funds or built at market rates. If an affordable housing project was not constructed on this site, the social benefits of providing new affordable housing opportunities on an urban infill parcel would not occur.

The proposed project must acquire all required permits and approvals prior to construction; the proposed project would be consistent with all land use plans, policies, and regulations for the project site. Not building on this site could potentially result in more housing constructed outside of the urban area in agricultural and undeveloped areas, contributing to urban sprawl, regional traffic congestion, and regional air quality issues.

**Summary of Findings and Conclusions:**

The Housing Authority of the County of Santa Cruz is proposing the development of affordable housing on a vacant project site. The project would consist of 20 SRO affordable housing units. The proposed project would increase housing opportunities in the City. Residents of the affordable housing project would benefit from being in proximity to transportation corridors and activity centers which would provide opportunity for employment, social engagement, and commerce. The proximity of existing transit options to the project site would reduce long-term air emissions and energy use associated with motor vehicle travel.

Because the project is within a developed urban area, the project would be adequately served by utilities and public services. The project would conform to all applicable federal, state, and regional regulations associated with land use compatibility, air emissions, water quality, geologic hazards, and related environmental resources addressed herein. Based on the analyses of environmental issues contained in this document, the proposed project is not expected to have significant environmental impacts.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Unique Natural Features, Water Resources

**Mitigation Measure 1**                      The proposed project shall include best management practices (BMPs) designed according to the guidance of the California Stormwater Quality Association’s Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment. Construction (temporary) BMPs for the proposed project shall include hydroseeding, straw mulch, velocity dissipation devices, silt fencing, fiber rolls, storm drain inlet protection, wind erosion control, and stabilized construction entrances.

**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
The project may significantly affect the quality of the human environment.

Preparer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title/Organization: Clara Stanger/Senior Planner/City of Santa Cruz Planning and Community Development

Certifying Officer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name/Title: Jessica de Wit, City of Santa Cruz Housing and Community Development Division Manager

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



**ENVIRONMENTAL REVIEW RECORDS (ERRs)**

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**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

## **Airport Hazards (CEST and EA) – PARTNER**

<https://www.hudexchange.info/environmental-review/airport-hazards>

**1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?**

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

**2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?**

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

**3. Is the project in conformance with DOD guidelines for APZ?**

Yes, project is consistent with DOD guidelines without further action.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

**If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

Click here to enter text.

→ *Work with the RE/HUD to develop mitigation measures. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

**Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

The project site is located approximately 15 miles from the nearest municipal airport, Watsonville Municipal Airport, and approximately 115 miles from the nearest military airport, Travis Air Force Base (see Attachment 4).



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## Floodplain Management (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/floodplain-management>

1. Does [24 CFR 55.12\(c\)](#) exempt this project from compliance with HUD’s floodplain management regulations in Part 55?

Yes

Provide the applicable citation at 24 CFR 55.12(c) here. If project is exempt under 55.12(c)(6) or (8), provide supporting documentation.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary.

No → Continue to Question 2.

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs).

### Does your project occur in a floodplain?

No → Continue to the Worksheet Summary below.

Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway → Continue to Question 3, Floodways

Coastal High Hazard Area (V Zone) → Continue to Question 4, Coastal High Hazard Areas

500-year floodplain (B Zone or shaded X Zone) → Continue to Question 5, 500-year Floodplains

100-year floodplain (A Zone) → The 8-Step Process is required. Continue to Question 6, 8-Step Process

3. **Floodways**

Is this a functionally dependent use?

Yes

The 8-Step Process is required. Work with HUD or the RE to assist with the 8-Step Process.  
→ Continue to Worksheet Summary.

- No → *Federal assistance may not be used at this location unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

#### 4. **Coastal High Hazard Area**

**Is this a critical action such as a hospital, nursing home, fire station, or police station?**

- Yes → *Critical actions are prohibited in coastal high hazard areas unless an exception in 55.12(c) applies. You must either choose an alternate site or cancel the project.*

- No

**Does this action include new construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?**

- Yes, there is new construction of something that is not a functionally dependent use.  
New construction must be designed to FEMA standards for V Zones at 44 CFR 60.3(e) (24 CFR 55.1(c)(3)(i)).  
→ Continue to Question 6, 8-Step Process

- No, this action concerns only existing construction.  
Existing construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.  
→ Continue to Question 6, 8-Step Process

#### 5. **500-year Floodplain**

**Is this a critical action?**

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below.*

- Yes → Continue to Question 6, 8-Step Process

#### 6. **8-Step Process.**

**Is this 8-Step Process required? Select one of the following options:**

- 8-Step Process applies.  
This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD's elevation requirements.  
→ Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.
- 5-Step Process is applicable per 55.12(a)(1-3).  
**Provide the applicable citation at 24 CFR 55.12(a) here.**  
Click here to enter text.  
→ Work with the RE/HUD to assist with the 5-Step Process. Continue to Worksheet Summary.
- 8-Step Process is inapplicable per 55.12(b)(1-4).  
**Provide the applicable citation at 24 CFR 55.12(b) here.**

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

**Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

**Include all documentation supporting your findings in your submission to HUD.**

FEMA FIRM Map 06087C0333F, effective date September 29, 2017 (see Attachment 6); the project is located in an area of Minimal Flood Hazard (Zone X).



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## Air Quality (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/air-quality>

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes → Continue to Question 2.

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.

2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

Follow the link below to determine compliance status of project county or air quality management district:

<https://www.epa.gov/green-book>

No, project’s county or air quality management district is in attainment status for all criteria pollutants

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project’s management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels



→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed de minimis or threshold emissions.*

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ *Continue to Question 4. Explain how you determined that the project would not exceed de minimis or threshold emissions in the Worksheet Summary.*

- 4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

### **Include all documentation supporting your findings in your submission to HUD.**

The proposed project falls under the jurisdiction of the Monterey Bay Air Resources District (MBARD) and is within the North Central Coast Air Basin (NCCAB).

According to MBARD, under the Federal Clean Air Act, the NCCAB is designated a maintenance area for the federal one-hour ozone national ambient air quality standards (AAQS). The NCCAB was redesignated from a moderate nonattainment area to a maintenance area in 1997 after meeting the federal one-hour ozone standard in 1990. The NCCAB is also designated as an attainment area for the federal eight-hour ozone AAQS. Furthermore, according to the MBARD CEQA Guidelines, as of June 2005, the NCCAB met all federal air quality standards. As a result, it is no longer subject to federal conformity requirements.



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

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## Coastal Zone Management Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/coastal-zone-managementh>

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samoa	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

**1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?**

- Yes → Continue to Question 2.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

**2. Does this project include activities that are subject to state review?**

- Yes → Continue to Question 3.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

**3. Has this project been determined to be consistent with the State Coastal Management Program?**

- Yes, with mitigation. → The RE/HUD must work with the State Coastal Management Program to develop mitigation measures to mitigate the impact or effect of the project.
- Yes, without mitigation. → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.
- No → Project cannot proceed at this location.

**Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

**Include all documentation supporting your findings in your submission to HUD.**

Pursuant to the California Coastal Act, the City has a Local Coastal Program (LCP) that was certified by the California Coastal Commission (CCC). The LCP consists of a land use plan, implementing ordinances and maps applicable to the coastal zone portions of the City, and applies to all private and public projects located within the coastal zone. The purpose of these overlay districts is to preserve and protect the coastal and environmental resources within the City and to provide the means of carrying out policies of the Coastal Act and the City's LCP. Per sections 24.10.2400 and 24.10.2500 of the City's Municipal Code, the project is subject to a City Coastal Permit. For Coastal Permit approval, the City's approving authority would be required to make findings pursuant to section 24.10.2430 of the Municipal Code related to grading, erosion control, coastal hazards, public views, shoreline access, and more generally, the goals of the LCP. Coastal Permit review and approval, which occurred on March 17, 2022 before the City's Planning Commission, is considered application of uniformly applied development standard, which ensures project compliance with its Coastal Zone overlay designation and California Coastal Act.

The Santa Cruz City Council approved the Coastal Permit on April 26, 2022, and the approval was not appealed to the California Coastal Commission. The City Council made findings related to the project's compliance with the Coastal Zone Overlay to approve the Coastal Permit as summarized below, and the project is subject to approved Conditions of Approval. See Attachment 7.

Coastal resources that will or could be affected by the project include the heritage trees on the site, potential archaeological resources, and Moore Creek and Antonelli Pond west and southwest of the site. The project is consistent with LCP policies CD 6.1.1 and CD 6.1.2, which require review of projects with heritage trees and replacement plantings at a two-to-one ratio. Policy CR 1.2.2 requires projects to evaluate the extent of on-site archaeological and paleontological resources through archival research, site surveys and necessary supplemental testing as part of the initial environmental assessment on each potentially significant site. The project has done this with an archaeological investigation and a standard condition of approval requires the applicant to stop work in the event archaeological or paleontological resources are discovered. To protect the nearby biotic resources within Moore Creek and Antonelli Pond, the project is consistent with LCP policy EQ 3.1, which requires site design and erosion control measures in areas adjacent to stream and wetland areas. To comply with this policy, the project has been reviewed for consistency with the City's storm water and construction BMPs. The project is also consistent with LCP policies LU 1.4 and CR 1.2.2 which call on projects to utilize the environmental review process to ensure protection of natural resources, significant vegetation communities, wildlife habitats, archaeologically sensitive areas, scenic views and also mitigate and protect development from environmental hazards such as earthquakes.

## Contamination and Toxic Substances (Multifamily and Non-Residential Properties) – PARTNER

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General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
<a href="https://www.hudexchange.info/programs/environmental-review/site-contamination">https://www.hudexchange.info/programs/environmental-review/site-contamination</a>		

**1. How was site contamination evaluated?<sup>1</sup> Select all that apply.**

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

→ Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

- No

<sup>1</sup> HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD’s toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

**Explain:** The site assessment summarized in the Phase I ESA revealed no evidence of recognized environmental conditions, historical recognized conditions, or controlled recognized environmental conditions in connection with the project site.

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes.

→ *Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.*

### 3. Mitigation

Work with the RE/HUD to identify the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

#### Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements<sup>2</sup> and documents. Continue to Question 4.*

### 4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls<sup>3</sup>, or use of institutional controls<sup>4</sup>.

---

<sup>2</sup> Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

<sup>3</sup> Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

<sup>4</sup> Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

**If a remediation plan or clean-up program was necessary, which standard does it follow?**

Complete removal

→ *Continue to the Worksheet Summary.*

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

### **Worksheet Summary**

#### **Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on.

A Phase I Environmental Site Assessment (ESA) of the subject property was performed by Dudek in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-21) (ASTM 2021). The ESA did not reveal evidence of recognized environmental conditions (RECs), historical RECs, controlled RECs, or vapor encroachment conditions (VECs) in connection with the subject property (see Attachment 8).

**Are formal compliance steps or mitigation required?**

Yes

No



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

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## Endangered Species Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/endangered-species>

### 1. Does the project involve any activities that have the potential to affect species or habitats?

- No, the project will have No Effect due to the nature of the activities involved in the project.  
→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*
- No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.  
**Explain your determination:**  
Click here to enter text.  
→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*
- Yes, the activities involved in the project have the potential to affect species and/or habitats.  
→ *Continue to Question 2.*

### 2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#).

- No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.  
→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.*
- Yes, there are federally listed species or designated critical habitats present in the action area.  
→ *Continue to Question 3.*

**3. Recommend one of the following effects that the project will have on federally listed species or designated critical habitat:**

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ Partner entities should not contact the Services directly. *If the RE/HUD agrees with this recommendation, they will have to complete Informal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ Partner entities should not contact the Services directly. *If the RE/HUD agrees with this recommendation, they will have to complete Formal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

**Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

The ranges of 17 threatened or endangered species overlap with the project site. However, according to the U.S. Fish and Wildlife Service's IPaC database, biological site reconnaissance, and biological resource technical memorandum performed for the project, the project site is located outside of critical habitat areas for the endangered or threatened species that have these areas defined. Furthermore, the project site is surrounded by urban and commercial uses. No riparian habitat is located on or adjacent to the project site. The project site is not located within in or adjacent to the management area or riparian and development setback areas established in the City of Santa Cruz *City-wide Creeks and Wetlands Management Plan*. For these reasons, no species or critical habitat are anticipated to occur at the site, and there would be no impacts to listed species or critical habitat (see Attachment 9).





**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

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## Historic Preservation (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/historic-preservation>

### Threshold

#### Is Section 106 review required for your project?

- No, because a Programmatic Agreement states that all activities included in this project are exempt. (See the [PA Database](#) to find applicable PAs.)

**Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:**

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

**Either provide the memo itself or a link to it here. Explain and justify the other determination here:**

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

- Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

#### **The Section 106 Process**

After determining the need to do a Section 106 review, HUD or the RE will initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Only RE or HUD staff may initiate the Section 106 consultation process. Partner entities may gather information, including from SHPO records, identify and evaluate historic properties, and make initial assessments of effects of the project on properties listed in or eligible for the National Register of Historic Place. Partners should then provide their RE or HUD with all of their analysis and documentation so that they may initiate consultation.

### Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if the RE or HUD should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that only HUD or the RE may initiate consultation with Tribes. Partner entities may prepare a draft letter for the RE or HUD to use to initiate consultation with tribes, but may not send the letter themselves.

#### List all organizations and individuals that you believe may have an interest in the project here:

1. State Historic Preservation Office; no objection with determination of No Historic Properties Affected on October 24, 2022 (complete; see Attachment 11).
2. The City of Santa Cruz (City) coordinated with the California Native American Heritage Commission (NAHC) to identify tribes that are traditionally and culturally affiliated with the project area. The City sent letters to the tribes the NAHC recommended. Pursuant to Public Resources Code Section 21080.3.1(c), tribes that are traditionally and culturally affiliated with the project site were consulted (see Attachment 11, which includes tribal correspondence and archaeological report with records search). The Amah Mutsun Tribal Band of Mission San Juan Bautista replied on August 17, 2022 and recommended a cultural sensitivity training be conducted for individuals involved in earth disturbance as well as a qualified archaeological and Native American monitor be present during earth movement. The letters were followed up with phone calls to the remaining contacts on September 22, 2022. A response was received from the Amah Mutsun Tribal Band on September 23, 2022 requesting notification in the event cultural resources are discovered. No additional responses have been received.

→ Continue to Step 2.

### Step 2 - Identify and Evaluate Historic Properties

**Provide a preliminary definition of the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE.** Attach an additional page if necessary.

415 Natural Bridges Drive  
Santa Cruz, CA, 95060

See EA Figure 1 (Attachment 1).

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to HUD's website for guidance on identifying and evaluating historic properties.

**In the space below, list historic properties identified and evaluated in the APE.**

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

[Click here to enter text.](#)

*Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.*

**Was a survey of historic buildings and/or archeological sites done as part of the project?**

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

Yes → *Provide survey(s) and report(s) and continue to Step 3.*

Additional notes:

[Click here to enter text.](#)

No → *Continue to Step 3.*

**Step 3 - Assess Effects of the Project on Historic Properties**

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

**Choose one of the findings below to recommend to the RE or HUD.**

**Please note: this is a recommendation only. It is **not** the official finding, which will be made by the RE or HUD, but only your suggestion as a Partner entity.**

No Historic Properties Affected

**Document reason for finding:**

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

**Document reason for finding and provide any comments below.**

Comments may include recommendations for mitigation, monitoring, a plan for unanticipated discoveries, etc.

[Click here to enter text.](#)

Adverse Effect

**Document reason for finding:**

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)]

Click here to enter text.

**Provide any comments below:**

Comments may include recommendations for avoidance, minimization, and/or mitigation.

Click here to enter text.

*Remember to provide all documentation that justifies your National Register Status determination and recommendations along with this worksheet.*



## Noise (EA Level Reviews) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control>

### 1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ Continue to Question 2.

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ Continue to Question 2.

- None of the above

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

### 2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

- There are no noise generators found within the threshold distances above.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

- Noise generators were found within the threshold distances.

→ Continue to Question 3.

### 3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

- Acceptable (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

**Indicate noise level here:** 65 dBA DNL/ L<sub>dn</sub>

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

- Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

**Indicate noise level here:** 71 dbA DNL

If project is rehabilitation:

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

**Is the project in a largely undeveloped area<sup>1</sup>?**

No

Yes → ***The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i).***

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

- Unacceptable: (Above 75 decibels)

**Indicate noise level here:** [Click here to enter text.](#)

If project is rehabilitation:

*HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.*

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

If project is new construction:

***The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Work with HUD or the RE to either complete an EIS or obtain a waiver signed by the appropriate authority.***

→ *Continue to Question 4.*

- 4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Work with the RE/HUD on the development of the mitigation measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

- Mitigation as follows will be implemented:

→ *Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.*

<sup>1</sup> A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

*Continue to the Worksheet Summary.*

- No mitigation is necessary.

**Explain why mitigation will not be made here:**

[Click here to enter text.](#)

→ *Continue to the Worksheet Summary.*

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information.

Exterior uses with a day night average sound level (DNL) of 65 dBA or less are considered normally acceptable according to HUD's noise standards found in 24 CFR Part 51, Subpart B. Using HUD's Day/Night Noise Level Calculator Electronic Assessment Tool, the project's estimated on-site noise level is lower than the HUD noise standard of 65 dBA DNL/Ldn.

The project site is located approximately 340 feet south of Mission Street and approximately 770 feet south of Highway 1/Cabrillo Highway. A former Southern Pacific Railroad rail line is located south of the project site, but the rail line is inactive and no active rail lines are located in the project vicinity. The nearest airport is Watsonville Municipal Airport, located approximately 15 miles to the east. Thus, the primary noise source in the project vicinity is roadway traffic noise.

The HUD day/night noise level model was run with the project site plan, as well as published Average Daily Trip traffic volumes from the Santa Cruz County Regional Transportation Committee for Natural Bridges Drive, Mission Street and Highway 1/Cabrillo Highway (projected out to Year 2034 at an assumed annual increase rate of 1 percent per year), and speed limit information and building setback measurements from online aerial imagery.

The model run predicted 24-hour noise level at the project site's façade as 61 dBA DNL/Ldn. Thus, the noise level at the project site would be less than the HUD exterior noise standard of 65 dBA DNL and falls into the "normally acceptable" category.

**Include all documentation supporting your findings in your submission to HUD.**

See Attachment 12.



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, DC 20410-1000

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## Wetlands (CEST and EA) – Partner

<https://www.hudexchange.info/environmental-review/wetlands-protection>

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance?**

The term "new construction" includes draining, dredging, channelizing, filling, diking, impounding, and related activities and construction of any structures or facilities.

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

**2. Will the new construction or other ground disturbance impact a wetland as defined in E.O. 11990?**

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes → *Work with HUD or the RE to assist with the 8-Step Process.* *Continue to Question 3.*

**3. Does Section 55.12 state that the 8-Step Process is not required?**

No, the 8-Step Process applies.

This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD’s elevation requirements.

→ *Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.*

5-Step Process is applicable per 55.12(a).

**Provide the applicable citation at 24 CFR 55.12(a) here.**

[Click here to enter text.](#)

→ *Work with the RE/HUD to assist with the 5-Step Process. This project may require mitigation or alternations. Continue to Worksheet Summary.*

8-Step Process is inapplicable per 55.12(b).

**Provide the applicable citation at 24 CFR 55.12(b) here.**

[Click here to enter text.](#)



→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

8-Step Process is inapplicable per 55.12(c).

**Provide the applicable citation at 24 CFR 55.12(c) here.**

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

**Include all documentation supporting your findings in your submission to HUD.**

The project site is not in or directly adjacent to a wetland (see Attachment 14). The nearest wetland resources, according to the National Wetlands Inventory map is the Antonelli Pond, approximately 500 feet southwest project site. The wetland resource is designated as a freshwater pond on according to the National Wetland Inventory map.

## Wild and Scenic Rivers (CEST and EA) – PARTNER

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297
References		
<a href="https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers">https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers</a>		

### 1. Is your project within proximity of a NWSRS river as defined below?

**Wild & Scenic Rivers:** These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational

Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.

Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

No

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.*

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

→ *Continue to Question 2.*

**2. Could the project do *any* of the following?**

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

- No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.
- *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*
- Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.
- *The RE/HUD must work with the Managing Agency to identify mitigation measures to mitigate the impact or effect of the project on the river.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

The project site does not contain any rivers protected under the Wild and Scenic Rivers Act. Merced River, approximately 115 miles northeast of the project site, is the closest Wild and Scenic waterway to the project site (see Attachment 15).

**Are formal compliance steps or mitigation required?**

- Yes
- No



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-1000

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## Environmental Justice (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/environmental-justice>

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?**

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

**2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?**

Yes

**Explain:**

*Click here to enter text.*

→ *The RE/HUD must work with the affected low-income or minority community to decide what mitigation actions, if any, will be taken. Provide any supporting documentation.*

No

**Explain:**

**Air Quality:** The project is not expected to lead to significant dust or particulate matter emissions; no disproportionate impacts to low-income and/or minority communities would occur as a result of impacts to air quality.

**Hazards Materials:** The project site does not contain hazardous materials or recognized environmental conditions that could lead to pollution or the threat of pollution; therefore, no disproportionate impacts to low-income and/or minority communities would occur as a result of hazardous materials.

**Erosion and Stormwater Runoff:** With implementation of stormwater mitigation measures outlined in a Stormwater Management Plan, no disproportionate impacts to low-income and/or minority communities would occur as a result of erosion, drainage, and stormwater runoff.

**Noise:** Using HUD’s Day/Night Noise Level Calculator Electronic Assessment Tool, the model run predicted 24-hour noise level at the project site’s façade as 61 dBA DNL/Ldn. Thus, the noise level

at the project site would be less than the HUD exterior noise standard of 65 dBA DNL and falls into the “normally acceptable” category. Therefore, no significant impacts to low-income and/or minority communities would occur as a result of outdoor ambient noise levels.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information.

**Air Quality:** Construction activities such as grading may cause temporary adverse impacts to air quality from fugitive dust during project construction. However, according to Monterey Bay Air Resources District’s *CEQA Air Quality Guidelines*, construction activity on 8.1 acres per day with minimal earthmoving or 2.2 acres per day with grading and excavation are assumed to be below the MBARD’s particulate matter significance threshold of 82 pounds per day. The project site is approximately 0.35 acres in size, which is below screening-level threshold. Because the site is below screening threshold size, project construction dust and particulate matter emissions would not be considered substantial or result in an air quality violation. Therefore, no disproportionate impacts to low-income and/or minority communities would occur as a result of fugitive dust.

**Hazardous Materials:** A Phase I Environmental Site Assessment (ESA) of the subject property was performed by Dudek in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-21) (ASTM 2021). The ESA did not reveal evidence of recognized environmental conditions (RECs), historical RECs, controlled RECs, or vapor encroachment conditions (VECs) in connection with the subject property.

As part of the Phase I ESA, a review of Environmental Database Report (EDR) records for the project site did not reveal any underground storage tanks or aboveground storage tanks for the parcel. The ESA notes that the project site is listed in the Hazardous Waste Tracking System (HWTS) and HAZNET databases. Both the HWTS and HAWNET listings are associated with the removal and transport of asbestos-containing material. In 2015, 2.07 tons of asbestos-containing material was removed from the subject property and disposed of at a landfill. The ESA concludes that because the asbestos-containing material was removed and is inert, it is unlikely that that this listing has adversely impacted the subject property. Underground storage tanks and aboveground storage tanks were also not observed during the site reconnaissance.

Because there are no RECs in connection to the subject property and asbestos-containing material was removed, no disproportionate impacts to low-income and/or minority communities would occur as a result of hazardous materials.

**Erosion/Drainage/Stormwater Runoff:** Construction activities may temporarily increase impacts from erosion, drainage, and stormwater runoff. However, with implementation of best management practices per the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development/Redevelopment, and the requirements of the National Pollutant Discharge Elimination System construction stormwater quality permit (see Mitigation Measure 1 in the Environmental Assessment), the potential temporary impacts would be minimized and kept on site to the greatest extent possible. Therefore, no disproportionate impacts to low-income and/or minority communities would occur as a result of erosion, drainage, and stormwater runoff.

**Noise:**Construction Noise.

A temporary increase in noise levels would be expected during the construction phase of the project. Noise would be generated by construction equipment and the delivery of materials, among other activities. Increases in ambient noise levels would be restricted to daytime hours and would remain within applicable thresholds.

Operational Noise.

Exterior uses with a day night average sound level (DNL) of 65 dBA or less are considered normally acceptable according to HUD's noise standards found in 24 CFR Part 51, Subpart B. Using HUD's Day/Night Noise Level Calculator Electronic Assessment Tool, the project's on-site noise level is lower than the HUD noise standard of 65 dBA DNL/Ldn.

The project site is located approximately 340 feet south of Mission Street and approximately 770 feet south of Highway 1/Cabrillo Highway. A former Southern Pacific Railroad rail line is located south of the project site, but the rail line is inactive and no active rail lines are located in the project vicinity. The nearest airport is Watsonville Municipal Airport, located approximately 15 miles to the east. Thus, the primary noise source in the project vicinity is roadway traffic noise.

The HUD day/night noise level model was run with the project site plan (Attachment 12), as well as published Average Daily Trip traffic volumes from the Santa Cruz County Regional Transportation Committee for Natural Bridges Drive, Mission Street and Highway 1/Cabrillo Highway (projected out to Year 2034 at an assumed annual increase rate of 1 percent per year), and speed limit information and building setback measurements from online aerial imagery.

The model run predicted 24-hour noise level at the project site's façade as 61 dBA DNL/Ldn. Thus, the noise level at the project site would be less than the HUD exterior noise standard of 65 dBA DNL and falls into the "normally acceptable" category. Therefore, no disproportionate impacts to low-income and/or minority communities would occur as a result of environmental noise sources, such as trains and vehicle traffic.

**Include all documentation supporting your findings in your submission to HUD.**

Assessment of the environmental factors for the proposed development revealed that the project would not have adverse impacts to land development, community facilities and services, or natural features. The project would have beneficial impacts to socioeconomic aspects of the surrounding community and target population.

**ATTACHMENTS**  
**(In Separate Files)**

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