



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Pacific Station North Apartments

Responsible Entity: City of Santa Cruz

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

State/Local Identifier:

Preparer: R.L. Hastings & Associates, LLC

Certifying Officer Name and Title: Jessica de Wit, Manager (see information below)

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to: Jessica de Wit
Housing & Community Development Division Manager
City of Santa Cruz Economic Development Office
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Project Location:

City of Santa Cruz, CA 95060

902 Pacific Avenue (APN #005-152-33)
912 Pacific Avenue (APN #005-152-05)
920 Pacific Avenue (APN #005-152-31)
1004 Pacific Avenue (APN # 005-152-30)
333 Front Street (APN #005-152-32)

USGS Santa Cruz Quad - T11S, R2W, Section 13

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

Located at 902 Pacific Avenue in downtown Santa Cruz, Pacific Station North Apartments will be a 128-unit community with a mix of studio, 1-BR, 2-BR, and 3-BR apartments for individuals and families. Thirty-two (32) units will be set aside for extremely low-income households, with twenty-one (21) units targeted for individuals and families who are homeless or at risk of homelessness and eleven (11) homes available for families in the Housing Authority of the County of Santa Cruz (HACSC)'s Family Unification Program. Additionally, thirty-one (31) homes will support Section 8 Project-Based Vouchers to ensure households are not paying more than 30% of their income toward rent. Two (2) units will be set aside as Manager's units and the remaining sixty-three (63) units will be restricted to individuals and families earning less than 50% and 60% of the Area Median Income.

Residential common areas are located on the third floor of the building and include a 1,300 SF outdoor patio, 1,250 SF community room, central laundry facility, computer room, and flex space. No parking is provided on site. The project is designed to be all-electric and is targeting a LEED Platinum certification, per its funding commitments. The design will include construction methods and materials that will comply (or exceed) ADA standards. Universal design features will be incorporated into the project to the greatest extent possible.

In addition to 128 affordable apartments and associated community spaces, the ground floor of Pacific Station North Apartments will include approximately 9,000 SF of turnkey retail, commercial, and office spaces. Once constructed and a Condo and/or Airspace Subdivision map is recorded, the Partnership will transfer ownership of the retail and commercial improvements to the City of Santa Cruz. While the cost for construction of these spaces is included in the overall project budget, no ongoing operating income or expenses to the project are assumed. While there are joint support spaces that will serve all three components, the shared expenses are minimal and will be prorated accordingly during the final mapping process.

Lastly, as a condition of its entitlements, site control, and funding sources, the Partnership will be responsible for constructing \$17 million in off-site infrastructure costs, including a new METRO station and bus loading area, a pedestrian paseo (Maple Alley), bicycle/pedestrian/traffic improvements along Front Street and Pacific Avenue, a portion of the Monterey Bay Sanctuary Scenic Trail, a solar array, and significant offsite utilities including stormwater, fiber, and undergrounding.

The project is designed to be all electric and is targeting a LEED Platinum certification – but at a minimum will achieve a LEED Gold certification. Additionally, the non-residential portions of the project will be folded into the LEED certification and meet the overall sustainability criteria for the development. This includes specific requirements for the City of Santa Cruz.

The project has several primary climate vulnerabilities – wildfires, heat, and precipitation change. To mitigate local impacts of climate change in the community, Pacific Station North Apartments will incorporate a number of climate adaptation infrastructure, landscape, and built environment features.

- To protect residents from the deterioration in air quality during wildfires, the building will be designed with a tight building envelope, the ability to disable continuous ventilation, and a minimum of MERV 13 filters on the mechanical systems.
- Fire hazard prevention measures include fire resistant outdoor furniture, a class A fire rated roof, fire rated soffits at eaves and balconies, and a 6' noncombustible vertical zone around the property.
- With the number of extreme heat days expected to increase over time, Pacific Station North will take a number of steps to reduce the heat island effect and maintain thermal comfort for its residents, including the installation of an Energy Star rated and Cool Roof Rating Council (CRRC) approved Cool Roof, with high solar reflectivity and R38 insulation.
- The Pacific Station North project will increase the permeable surfaces compared to the existing bus transit station. Street trees, landscape planters designed to collect rainwater, and a green roof will provide the opportunity for rainwater to infiltrate into the ground and reduce the likelihood of flooding in an extreme precipitation event.
- Pacific Station North has also eliminated on-site parking, which mitigates pollution generated by the private vehicles of residents.
- To support the resident's use of alternative modes of transportation, the ownership entity will provide free transit passes to all residents for a period of three years, more than one secured bicycle parking space per unit, and workshops on bicycle maintenance and commuting.
- Limit the use of vinyl and volatile organic compounds (VOCs) in building materials.
- Onsite solar energy generation to meet the needs of the shared areas. To encourage bicycle and transit use, residents will have access to a large, secured bicycle storage room and will receive free annual METRO bus passes for the initial 3 years of operation.

The project will include all necessary infrastructure replacement including, but not limited to curbing, gutters, sidewalks, street lighting and storm drains.

Description of the Area

The City of Santa Cruz (Spanish for 'Holy Cross') is the largest city and county seat of Santa Cruz County. The County is situated at the northern tip of Monterey Bay, with the City stretching along the coastline and inland to the coastal range, approximately 65 miles south of San Francisco, 35 miles north of Monterey, and 35 miles southwest of Silicon Valley. As of 2021, the U.S. Census Bureau estimated Santa Cruz's population at 61,950 while Santa Cruz County has approximately 267,792 residents.

Santa Cruz is known for its moderate Mediterranean climate with low humidity and sunshine 300 days a year, its natural environment, coastline, redwood forests, alternative community lifestyles, and socially liberal leanings. It is also home to the University of California, Santa Cruz, a premier research institution and educational hub, as well as the Santa Cruz Beach Boardwalk, an oceanfront amusement park operating continuously since 1907.

The present-day site of Santa Cruz was the location of Spanish settlement beginning in 1791, including Mission Santa Cruz and the pueblo of Branciforte. The City of Santa Cruz was incorporated in 1866 and chartered in April 1876. Important early industries included lumber, gunpowder, lime and agriculture. Late in the 19th century, Santa Cruz established itself as a beach resort community.

Santa Cruz County is the Gateway to the Monterey Bay National Marine Sanctuary, has 29 miles of coastline and includes numerous state parks and beaches. Its quaint shops and restaurants, coupled with a multitude of cultural and recreational activities, including sailing, fishing, golfing, surfing, kayaking, hiking and biking, provide a wealth of leisure activities. The State of California owns and maintains 42,334 acres of parks in the coastal and mountainous areas of the County. The County maintains an additional 1,593 acres of parks, not including the numerous parks also found within the cities. Cultural amenities include the Santa Cruz County Symphony, the Cabrillo Music Festival, Shakespeare Santa Cruz, the McPherson Museum of Art and History, the University of California Performing Arts Center, and the Henry J. Mello Performing Arts Center.

The area's strong local economy is anchored by technology, agriculture, and tourism. The school system includes Cabrillo Community College and the University of California, Santa Cruz. Santa Cruz also hosts the Long Marine Laboratory, the Lick Observatory, the National Marine Fisheries service, and the Monterey Bay National Marine Sanctuary Exploration Center.

The City is served by the San Jose International Airport, the San Francisco International Airport, Oakland International Airport, Monterey Peninsula Airport, and the Santa Cruz Municipal Airport. Rail access is provided by Union Pacific Railroad, with a railhead at Santa Cruz Junction.

As of July 1, 2021, the City has an estimated population of 61,950, a per capita personal income of \$41,594, a median income of \$86,618 (in 2020 dollars), and a median value for owner-occupied housing of approximately \$895,800 with an estimated 20.2% in poverty per the U.S. Census Bureau Quick Facts for the City of Santa Cruz, and a median gross rent of \$2,038.

Description of the Surrounding Neighborhood

The project site is located in downtown Santa Cruz in the Downtown Plan area. Surrounding site uses include commercial buildings on all sides. The site is fronted on the west by Pacific Avenue and the east by Front Street, two main commercial thoroughfares in Santa Cruz. Immediately to the east of the commercial buildings on Front Street is the San Lorenzo River. The adjoining site to the south is currently planned to be demolished and replaced by a mixed commercial/medical offices/housing project with ground floor commercial and upper floors housing. The site to the south of that is a planned mixed commercial/housing project.

Construction and Design Description

The Pacific Station North Apartments project will consist of one 84' high seven-story building with the first two floors utilizing Type 1A construction and the top five floors utilizing Type 3A construction. The project will be designed consistent with all applicable energy and accessibility code requirements. The building is designed to be all-electric to help facilitate the state's move toward a more sustainable future.

The design of the project is intended to provide a scaled development consistent with the surrounding site uses. The use of materials including cementitious siding and stucco, flat roofs, and colors provide a variety and layering to the buildings to break up the overall mass of the structures. The overall design is intended to provide residents with a comfortable feeling of home that will bring quality affordable housing to Santa Cruz.

The project will consist of a ground floor with roughly 5,817 SF of commercial space, approximately 3,500 SF for Metro Ticketing and Operations Center, residential mail room, bike room and utility spaces, and six (6) stories of residential space above. The top six (6) stories will house 12 studios, 50 one-bed/one-bath units (1/1), 32 two-bed/one-bath units (2/1) and 32 three-bedroom/one-bath units (3/1) plus 1 one-bedroom/one-bath (1/1) and 1 two-bedroom/one-bath (2/1) manager units. The studio units will be approximately 475 – 483 square feet, the one-bedroom units approximately 524 - 547 square feet, the two-bedroom units approximately 768 - 839 square feet, and the 3-bedroom units approximately 999 – 1,070 square feet.

Units will have Energy Star appliances (or sustainably comparable) including refrigerators, ovens with ranges, microwaves and dishwashers. The project will also feature photovoltaic panels on the roof to decrease the project's energy footprint and residents' costs.

Permanent Sources of Project Funding (Residential and Commercial):

1) Permanent Loan	\$ 19,199,000.00
2) City of Santa Cruz (HOME)	\$ 2,776,396.00
3) City of Santa Cruz (HOME ARP)	\$ 1,219,201.00
3) City of Santa Cruz (LHTF)	\$ 4,750,000.00
4) 19th Congressional Dist. Grant	\$ 2,000,000.00
5) HCD – IIG	\$ 9,657,179.00
6) HCD – AHSC	\$ 20,302,960.00
7) Deferred Developer Fee	\$ 1,300,000.00
8) LIHTC Equity - LP	\$ 54,362,275.00
9) GP Equity	\$ 5,000,000.00
Total Estimated Costs -	\$121,742,318.00

Permanent Sources of Project Funding (Santa Cruz Metro):

1) Santa Cruz Metro Contribution	\$ 4,000,000.00
2) HCD – AHSC	\$ 7,590,633.00
3) HCD – IIG	\$ 6,742,517.00
Total Estimated Costs -	\$18,333,150.00

Development Partners will include:

- 1) Eden Housing, Inc. (EDEN)
- 2) For the Future Housing (FTFH), in partnership with,
- 3) City of Santa Cruz, and
- 4) Santa Cruz Metropolitan Transit District (METRO)

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

The primary purpose of the proposed project, is to develop 128 units of affordable housing with units for extremely low-income and very low-income households, with some units set aside for family reunification. Of the total units, 2 managers' units will be reserved, in an area with high housing costs and limited affordable housing.

The immense need for affordable housing in the County is epitomized by the 10,851 applicants currently on the Housing Authority of the County of Santa Cruz waiting list per a letter from the Housing Authority dated January 30, 2023. Additionally, a *Comprehensive Housing Market Analysis Santa Cruz-Watsonville, California* prepared by the Office of Policy Development and Research of the U.S. Department of Housing and Urban Development, dated July 1, 2019, found the rental market to be "Extremely Tight" with a vacancy rate of only 1.9% and a demand for 570 new rental units over the following 3 years and only 130 under development.

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

The two reconfigured parcels on Front Street (005-152-30 and -32; 333 & 423 Front Street) will contain the new Metro Station and are zoned PF/CZ-O/FP-O (Public Facilities District/Coastal Zone Overlay District/Floodplain District) zone district and have a General Plan designation of CF (Community Facility) and are located within the Front Street/Riverfront Corridor subarea of the Downtown Plan. The reconfigured parcel on Pacific Avenue (005-152-33, -05 & -31; 902, 912 & 920 Pacific Avenue) is zoned CBD/CZ-O/FP-O (Central Business District, Coastal Zone Overlay, Floodplain Overlay) and with a General Plan designation of RVC (Regional Visitor Commercial) in the Pacific Avenue Retail District and Front Street Riverfront Corridor areas of the Downtown Plan.

The City of Santa Cruz has determined that the project is consistent with local planning documents and zoning ordinances. The property is located in the Downtown Plan area of the city surrounded by commercial uses. The City anticipates this area to continue developing with additional mixed uses, including additional housing, such as the project on the adjoining parcels to the south.

The City's goal is to continue redeveloping this area of the City to further its goals of placing housing near services and transit and reduce car usage and limit further urban sprawl and the need for additional infrastructure investments. It is possible that in the absence of this project, an alternative project may be proposed for the site at some time in the future, but this may be difficult to achieve without some form of City assistance and may not include the much-needed affordable housing that this project proposes to develop.

Funding Information

Grant Number	HUD Program	Funding Amount
N/A	HUD Project-Based Vouchers	\$29,146,800 ¹
M-18/19/20/21/22/23-MC-06-0236	HOME	\$2,776,396
M-21-MP-06-0236	HOME ARP	1,219,201

Estimated Total HUD Funded Amount: \$33,142,397

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$140,075,468

¹ Based upon 20 years of the total gross rental amount

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.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p><i>The project site is not within an FAA-designated civilian airport Runway Clear Zone (RCZ), or within a military airfield Clear Zone (CZ) or Accident Potential Zone (APZ).</i></p> <p>- Only those airports designated by the FAA as "commercial civil airports" which are part of the National Plan of Integrated Airports, are subject to HUD regulation 24 CFR 51D.</p> <p>- The nearest civilian airport to the project site is the Watsonville Municipal Airport, located over 12 miles east of the site, which has not been designated a primary or commercial civil airport by the FAA and is, therefore, not covered by 24 CFR Part 51 Subpart D.</p> <p>- There are no military airfields in the vicinity of the project site.</p> <p>- See Attach A: Airport Hazards</p>
Coastal Barrier Resources 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"/>	<p><i>There are no Coastal Barrier Resources in California.</i></p> <p>- See Attach B: Coastal Barrier Resources</p>

<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>The project does not involve property acquisition, land management, construction or improvement within a 100-year floodplain (Zones A or V) identified by FEMA maps.</i></p> <p>- According to FIRM map 06087C0332E dated May 16, 2012, the project site is located in Zone A99 a “Special Flood Hazard Area Without Base Flood Elevation (BFE)” determined.</p> <p>- Flood insurance is available and is required due to construction within the flood zone.</p> <p>- See Attach C: Floodplain Management</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The project site is located in an area which has no Federal criteria pollutants classified as Nonattainment.</i></p> <p>- Verified by EPA Greenbook “Currently Designated Nonattainment Areas for all Criteria Pollutants at https://www3.epa.gov/airquality/greenbook/ancl.html#CALIFORNIA downloaded 5.29.22.</p> <p>- See Attach D: Clean Air</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 117(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The majority of the project site is located in the coastal zone and involves the placement, erection or removal of materials and may increase the intensity of use in the coastal zone.</i></p> <p>- The project site is located within the Coastal Zone per attached City of Santa Cruz GIS Map. The project site consists of five (5) parcels that are in the process of being configured into three (3) parcels, two fronting Front Street and one fronting Pacific Avenue within the Pacific Avenue Retail District and Front Street/Riverfront Corridor subareas of the Downtown Plan. Portions of the three (3) reconfigured parcels will be located within the Coastal Zone. A Local Coastal Program Amendment (LCP-3-STC-21-0019-1 (Metro Center Station Land Use Re-Designations and Rezonings) was adopted and approved by the California Coastal Commission on April 15, 2021.</p> <p>- A Nonresidential Demolition Authorization Permit, Coastal Permit and Design Permit to demolish existing structures and construct a new downtown Santa Cruz Metro Transit Center including 22 bus bays, pedestrian circulation and crosswalks, and solar array canopies on a parcel located within the PF/CZ-O/FP-O (Public Facilities District/Coastal Zone Overlay District/Floodplain District) zone district and within the Front Street/Riverfront Corridor subarea of the Downtown Plan was approved on 6.2.21 for 005-152-30 and -32 (333 & 423 Front Street), and a Coastal Permit to demolish an existing structure and construct a seven-</p>

		<p>story mixed use building with 94 affordable residences, ground floor commercial, and second floor office space on a parcel located within the CBD/CZ-O/FP-O (Central Business District/Coastal Zone Overlay District/Floodplain District) zone district and within the Pacific Avenue Retail District subarea of the Downtown Plan for 005-152-33, -05 & -31 (902, 912 & 920 Pacific Avenue) was approved on 6.2.21, both with Conditions of Approval, attached to and incorporated by this reference into this EA.</p> <p>- See Attach E: Coastal Zone Management</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>The project involves new development for habitation; but is not located within one mile of an NPL (“Superfund”) site, within 2,000 feet of a CERCLIS site, nor adjacent to any other known or suspected sites contaminated with toxic chemicals or radioactive materials that are likely to affect the site other than CREC, REC and vapor conditions discussed below which are all being addressed.</i></p> <p><i>One of the buildings on the site – 920 Front Street, has 4% chrysotile asbestos on the undercoating of two sinks (approximately 8 SF) which will need to be mitigated in accordance with all applicable local, state and federal regulations.</i></p> <p><i>Two doors “were found to contain a concentration of lead that was greater than the laboratory detection limit by weight but less than the HUD definition and is considered to be a Lead Containing Paint and contractors should utilize “lead safe” work practices when disturbing this paint.”</i></p> <p>- Weber, Hayes & Associates (WHA) prepared a Phase I /Phase II Environmental Site Assessment (ESA) on the site, dated November 25, 2013 with the Phase I updated June 2, 2021.</p> <p>This assessment identified the following two (2) on-Site, and one (1) off-site environmental condition:</p> <ol style="list-style-type: none"> 1. One (1) controlled recognized environmental condition (CREC) associated with contaminants released at the former Greyhound terminal at the 425 Front Street location. The Site has been fully characterized and remediated to the satisfaction of the overseeing regulatory agency (DTSC). There is a limited agency obligation that consists of an annual inspection of the on-site protective cap. And, 2. One (1) recognized environmental condition (REC). This REC is identified based on the presence of a limited volume/footprint of contaminated soil, soil vapor, and groundwater beneath the METRO Station (912-920 Pacific Avenue). Abundant sampling has adequately characterized the plume which originates

from historic land use (i.e., is aged), is limited in size. WHA completed an Off-Site Vapor Intrusion Investigation (discussed below) and is preparing a Site Management Plan to address, among other purposes discussed below:

- a) any subsurface maintenance work that may occur prior to redevelopment, and
- b) annual inspections of the Site cap (concrete/asphalt surface cover).

The property owner is in compliance with overseeing agency requirements. As such, this aged chemical release site is considered a limited environmental liability.

Regulatory documents for each of the above can be found at the following online sites:

1. **425 Front Street parcel** (former Greyhound Station): The *State Department of Toxic Substances Control* (DTSC) oversees this remediated site (obligations include an annual cap inspection, *Land Use Covenant*).

- DTSC document archive:

http://www.ENVIROSTOR.dtsc.ca.gov/public/pr_ofile_report.asp?global_id=60001132

2. **920 Pacific Avenue parcels** (current METRO Pacific Station): The *County of Santa Cruz Health Services Agency* (SC-HSA) oversees this 2-parcel property (contains limited residual contaminants that underly existing protective concrete barriers).

- SC-HSA document archive:

https://GEOTRACKER.waterboards.ca.gov/profile_report.asp?global_id=T10000006376

3. One (1), potential off-site recognized environmental condition (REC), associated with the adjoining 325-329 Front Street because a PCE soil vapor plume appears to have encroached across the property line (albeit at low concentrations) to beneath the NIAC office building. The historical record, and agency records of subsurface investigations at adjoining and nearby properties provide a good record of environmental conditions (i.e., the potential for plume encroachment from offsite sources). As a result of the abundant record of sampling, subsurface conditions have been adequately characterized and additional Phase II sampling is unwarranted.

Due to the environmental deed restriction recorded with the 425 Front Street parcel, and the presence of impacted soil vapor beneath the METRO Station, future redevelopment will require:

- 1) A DTSC-approved, Soil Management Plan.
- 2) A vapor intrusion mitigation system (VIMS) for

building foundations of structures that will be occupied.

3) Limited source removal of any accessible contamination encountered during site development grading.

Vapor abatement technology is commonplace element of foundation design for the abatement of potential for vapor intrusion into buildings. Notification and concurrence of VIMS plans will be required by the overseeing agencies if land redevelopment is to occur.

Off-Site Vapor Intrusion Investigation

- WHA prepared an Off-Site Vapor Intrusion Investigation of Metro Pacific Station at 920 Pacific Avenue, dated 9.19.23 as required by the County of Santa Cruz Health Services Agency, Environmental Health Department to evaluate the potential for vapor intrusion risk to off-site buildings on the 920 Pacific Avenue block.

- Per WHA, "The off-Site soil vapor sampling results indicate the following:

- The preponderance of evidence shows that there is negligible, if any, lateral off-site VOC migration from the METRO station, and
- The elevated concentration of PCE detected in SV-10 is anomalous based on the multiple points of data surrounding this sample location."

WHA made the following recommendations:

- Multiple data collection over time has shown that a limited benzene and TPH-gasoline soil vapor plume is present beneath impermeable surfaces at the METRO Site which does not extend off-site. As the METRO moves forward with redevelopment activities there is a potential for undetected contamination (i.e., localized shallow soil impacts from historic spills). In an effort to streamline future redevelopment [WHA] will prepare a Soil Management Plan (SMP) under separate cover, which will specify procedures and contacts for managing contaminated soil if encountered during future demolition, construction, or grading activities.

- Additionally, based on the presence of elevated concentrations of residual benzene in subsurface soil vapor, we recommend a Vapor Intrusion Mitigation System (VIMS) be incorporated within the foundation design plans.

Asbestos (ACM) and Lead (LBP) Studies

- Adanta, Inc., performed limited asbestos containing materials (ACM) and lead-based paint (LBP) sampling of

		<p>333 Front Street, 920-2 and 920-4 Pacific Avenue, and 920 Pacific Avenue.</p> <p><i>Lead-Based Paint (LBP)</i></p> <p>“[B]rown paint on the 2nd Floor, Mechanical Room Door and the white paint on the 1st Floor, Restaurant were found to contain a concentration of lead that was greater than the laboratory detection limit by weight but less than the HUD definition and is considered to be a Lead Containing Paint and contractors should utilize “lead safe” work practices when disturbing this paint.”</p> <p><i>Asbestos Containing Materials (ACM)</i></p> <p>No ACM was detected in analyzed samples from 333 Front Street or 920-2 or 920-4 Pacific Avenue. ACM, 4% chrysotile asbestos was found in the undercoating of two kitchen sinks on the second floor of 920 Pacific Avenue – mitigation in compliance with all applicable local, state and federal regulations is required.</p> <p>- See Attach F: Contamination & Toxics Substances</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>- The project will not affect Federally listed or proposed threatened and endangered species, nor designated or proposed critical habitat.</p> <p>- The project is an urban infill project which is currently fully built out with structures and hardscape. There is no potential for critical habitat or endangered species.</p> <p>- Additionally, per the Notice of Exemption approved by the City for 902, 912 & 920 Pacific Avenue (005-152-05, -31 & -33), the City determined that: “The project site has no value as habitat for endangered, rare or threatened species”</p> <p>- The USFW Critical Habitat Mapper identified no critical habitat on or near the site.</p> <p>- See Attach G: Endangered Species</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project will expose neither people nor buildings to above-ground explosive or flammable fuels or chemicals containers hazards.</p> <p>- CalEPA’s Above Ground Storage Tank (AST) list shows 2 ASTs within 1 mile of the project site, both of which are outside of the Acceptable Separation Distance per the HUD ASD calculator (ASD Tool) at: https://www.hudexchange.info/environmental-review/asd-calculator/ and, therefore, do not present explosive hazards for the project site. Cal EPA’s Chemicals list shows the closest site to be SC Motorsports located at 211 Cedar Street, approximately 706’ from the project site, which is 100% blocked from the site by buildings. It has an up to 599-gallon oil tank, with an ASD of 224’, and a 240-gallon acetylene tank</p>

		<p>with an ASD of 153', well outside the ASD of each.</p> <p>- See Attach H for aerials showing the distance to each site and ASD calculations for container sizes.</p> <p>- See Attach H: Explosive and Flammable Hazards</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The project site contains Prime or Unique Farmland or other Farmland of Statewide or Local Importance as identified by the USDA, NRCS. 100% of site soils are defined as "Prime Farmland if Irrigated;" however, the project is an infill project on a fully developed site in a developed area of the City and is, therefore, exempt.</i></p> <p>- 100% of site soils are in Map Unit Symbol 104, "Prime Farmland if Irrigated." The project, however, is an urban infill project in a developed area of the City and is, therefore, exempt.</p> <p>- Verified through Web Soil Survey downloads from the USDA, NRCS website at http://websoilsurvey.sc.egov.usda.gov/App/HomePage.html downloaded 6.7.22</p> <p>- The California Department of Conservation "California Important Farmland Finder" designates the project site as "Urban and Built-up Land."</p> <p>- See Attach I: Farmlands Protection</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><i>The project involves property acquisition, land management, construction or improvement within a 100-year floodplain (Zones A or V) identified by FEMA maps.</i></p> <p>- According to FIRM map 06087C0332E dated May 16, 2012, the project site is located in Zone A99 a "Special Flood Hazard Area Without Base Flood Elevation (BFE)" determined.</p> <p>- Due to the location of the project site in a floodplain, a HUD 8-Step Floodplain Analysis documenting the 8-step decision making process contained in 24 CFR 55.20, and required by Executive Order 11988, was prepared. A "Public Notice for Proposed Activities in a Floodplain" was published in <i>The Santa Cruz Sentinel</i> on September 27, 2022. No comments were received by October 12, 2022. The analysis determined that the project should be built as proposed. A Final Notice was published in <i>The Santa Cruz Sentinel</i> on July 25, 2023. No responses were received during the 7-day comment period. The Determination documenting the 8-step process is in Attachment B.</p> <p>- Per HUD requirements, the structure will be elevated out of the flood zone or floodproofed to 2' above BFE for the site.</p> <p>- See Attach C: Floodplain Management</p>

Historic Preservation

National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800

Yes No

The City of Santa Cruz has determined, and SHPO has not objected, that no historic properties will be affected by the project.

No response to follow-up submission providing requested items.

Attachment J contains the following supporting documentation:

SHPO response letter dated 9.15.23 wherein SHPO stated that it was unable to comment on the City’s Finding without additional information: the Vertical APE for the project and the City’s response to the tribal correspondence received; City response to SHPO dated 9.19.23 providing the Vertical APE of 15’ to 25’ and the City’s response to tribal correspondence; City SHPO consultation letter dated 8.16.23 wherein the City stated it’s finding of “No Historic Properties Affected” per 36 CFR Part 800.4(d)(1); Cultural Resources Consultation Memorandum prepared by Page & Turnbull, dated March 30, 2021, including DPR 523A for 333 Front Street; Native American Heritage Commission (NAHC) response letter dated 10.12.22; Consultation letters sent to tribal list contacts dated 5.31.23 with two responses received – one from Chairperson Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista & A.M.T.B. Inc. who did not note any cultural or historical issues with the project site but provided 3 recommendations (see attached letter), and one from Kanyon Sayers-Roods, MLD on behalf of the Indian Canyon Band of Costanoan Ohlone People who stated that the site overlaps or is near the management boundary of a potentially eligible cultural site and she is interested in consulting and voicing the Tribes concerns and recommended the presence of a Native American Monitor and Archaeologist during ground disturbing activities; the City’s responses to the Tribal responses stating that the City intends to have Cultural Sensitivity Training conducted or construction crews, and; National Register of Historic Places (NRHP) internet search results for the City of Santa Cruz, with the nearest site approximately 0.23 miles (1,228’) north of the project site at the corner of Front and Cooper Streets.

- See Attach J: Historic Preservation

Noise Abatement and Control

Noise Control Act of 1953, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

Yes No

The project involves the development of noise sensitive uses and is located within 1,000’ of and within line-of-sight of, an arterial or greater roadway but is not located within line-of-sight of an active railroad line.

- The project spans the five (5) parcels (being reconfigured to three (3)) that form a rectangle running from Front Street to Pacific Avenue, both of which are classified by the City as arterial roadways.

- Figure 4.13-1, Existing Noise Contours, and Figure 4.13-2, Future Noise Contours, of the Santa Cruz General Plan 2030 Draft EIR, both show the project site below the HUD 65 dBA standard for exterior noise levels.

- There are no active railroad lines within line-of-sight of the project site.

- The project site is approximately 12 miles west of the nearest municipal airport in Watsonville and is outside of all airport noise contours per the attached Santa Cruz Airport Noise Contours Map.

- An *Environmental Noise Study* was prepared by Salter, dated 12 September 2023. “To quantify the existing noise environment with respect to vehicular traffic, [Salter] conducted one long-term noise measurement of the existing Metro station at the project site between 31 August and 1 September. The results of two previous long-term noise measurements at the project site between 4 and 11 May 2021 (see Figure 1 for the measurement locations and measured noise levels) were also used. The monitor was located on a tree approximately 12 feet above street level.” The studies found noise levels of DNL 70, DNL 70, and DNL 73, all within the HUD *Normally Unacceptable* range, and requiring noise mitigation measures.

- Per the HUD Exchange: “The ‘Normally Unacceptable’ noise zone includes community noise levels from above 65 decibels to 75 decibels. Approvals in this noise zone require a minimum of 5 dB additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 decibels of additional sound attenuation if the day-night average sound level is greater than 70 dB but does not exceed 75 dB.”

- Salter determined that the two roof deck play areas would have sound levels of less than DNL 60, thereby being acceptable with the planned design features and no mitigation required.

- Salter recommended STC rated doors and windows with glass and full frames to have STC ratings of 28 to 34 depending on locations, with the exception of the northwest corner of upper floors which require STC 37

		<p>and mechanical ventilation in any areas unable to achieve DNL 45 without windows closed.</p> <p>- With these mitigations the project will be in compliance with the Noise Control Act of 1953, as amended by the Quiet Communities Act of 1978 and 24 CFR Part 51 Subpart B.</p> <p>- See Attach K: Noise Abatement and Control</p>
<p>Sole Source Aquifers</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><i>The project is not located within an area designated by the EPA as being supported by a sole source aquifer.</i></p> <p><i>Verified by sole source aquifer map downloaded from: https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b on 6.7.22</i></p> <p>- See Attach L: Sole Source Aquifers</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The project involves new construction within or adjacent to a wetland(s) habitat.</i></p> <p>- Verified by: Wetlands Map downloaded from https://fws.gov/wetlands on 6.6.22</p> <p>- See Attach M: Wetlands Protection</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>The project is not within one mile of a listed section of a Wild and Scenic River.</i></p> <p>- The proposed project site is not located within one mile of any listed section of any Wild and Scenic River.</p> <p><i>Verified by the Wild and Scenic Rivers map downloaded from https://www.rivers.gov/river-app/index.html?state=CA on 6.7.22</i></p> <p>- See Attach N: Wild and Scenic Rivers</p>

ENVIRONMENTAL JUSTICE

Environmental Justice

Executive Order 12898

Yes No

The project site is suitable for its proposed use; and the project won't be adversely affected by a pre-existing environmental condition. All environmental factors can and will be mitigated.

- One structure to be demolished contains a limited amount of ACM on the bottom of a sink and LBP on two doors.

- All local, state and federal requirements for handling, removal and worker protection are required to be adhered to, include permits, chain-of-custody, and disposal in a location approved for said materials.

-The project environment ranges in noise levels from DNL 70 dBA to DNL 73 dBA which will require mitigation to ensure that indoor noise levels do not exceed DNL 45 dBA. The City is requiring mitigations.

- The project is located in flood zone AE and will be elevated out of the flood zone or flood proofed to a minimum of 2' above BFE. All residential units will be above the BFE.

As all issues will be mitigated, they will not present environmental issues for future residents. There are no other issues identified in the Environmental Assessment that would have an adverse effect on project residents and, therefore, there are no factors that will have environmental impacts disproportionately high for low-income and/or minority residents.

- Regardless of population group served, the population will not be affected disproportionately by environmental issues.

- Additionally, the project will benefit the minority and low-income populations by bringing much needed affordable housing units to the neighborhood and community.

- See Attachment O: Environmental Justice

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
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p><i>The project is in conformance with the City of Santa Cruz General Plan and is a compatible land use consistent with zoning ordinances and is compatible in scale and urban design with surrounding uses and proposed uses.</i></p> <ul style="list-style-type: none"> - Pacific Avenue Zoning: CBD/CZ-O/FP-O (Central Business District, Coastal Zone Overlay, Floodplain Overlay) - Pacific Avenue General Plan: RVC (Regional Visitor Commercial) <p>Project Consistency: Consistent with approval of permits.</p> <ul style="list-style-type: none"> - Front Street Zoning: PF (Public Facility) - General Plan: CF (Community Facility) <p>Project Consistency: Consistent with approval of permits.</p> <ul style="list-style-type: none"> - The project proposes to demolish the existing commercial buildings and construct a seven-story, mixed-use building with ground floor commercial, offices and residential on the second floor and 127 affordable residential apartments on floors 2-7. - The City will review and approve project design to ensure that the design is compatible with the neighborhood and meets all city design standards. - The project will produce no adverse urban impact as it is an urban redevelopment project within downtown Santa Cruz. <p>- See Attach P: Land Development</p>

<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p>3</p>	<p>Soil Suitability</p> <ul style="list-style-type: none"> - Cornerstone Earth Group (CEG) prepared a draft <i>Design-Level Geotechnical Investigation</i> for the project, dated May 28, 2021. CEG determined that: “From a geotechnical viewpoint, the project is feasible provided the concerns [identified in the report] are addressed in the project design.” CEG discussed each of the “concerns” and provided recommendations to address each in the report. The concerns identified were: the potential for liquefaction-induced settlements, redevelopment considerations, potential for lateral spreading, presence of undocumented fill, shallow groundwater, and soil corrosion potential. - The City requires that a final geotechnical engineering report be prepared and submitted as part of the city review and permitting process and shall require that the recommendations presented in the Report be incorporated into the project plans and specifications and implemented during construction and, furthermore, all applicable State and local building codes and City of Santa Cruz requirements are required to be complied with. <p>Slope</p> <ul style="list-style-type: none"> - The USDA NRCS slope rating for the site is “1,” representing a relatively level site with negligible slope and, therefore, slope is not an issue for development of the site. - <i>Verified through Web Soil Survey downloads from the USDA, NRCS website at http://websoilsurvey.sc.egov.usda.gov/App/HomePage.html downloaded 1.27.21</i> <p>Erosion</p> <ul style="list-style-type: none"> - A Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan prepared by a registered engineer or qualified stormwater pollution prevention plan developer will be required by the City to be submitted as an integral part of the grading plan. Additionally, all grading activities and placement of fill will be completed in accordance with the City’s Grading, Erosion, and Sediment Control Regulations. - The City will require that standard BMP’s be followed during construction to minimize construction related erosion from the site during construction activities. -Development of the proposed project will cover the entire site in hardscape and structures and will have no erosion potential. <p>Storm Water Runoff and Drainage</p> <p>Per the Downtown Plan Amendments Draft EIR:</p> <p>“Impact 4.5-1: Stormwater Drainage. Future development accommodated by the proposed plan amendments could result in stormwater runoff, but would not substantially alter the existing drainage pattern of the area, substantially increase the rate or amount of surface runoff, exceed the capacity of existing or planned</p>
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		<p>storm drain facilities, cause downstream or off-site drainage problems, or increase the risk or severity of flooding in downstream areas.”</p> <ul style="list-style-type: none"> - The proposed project will replace existing hardscape and structures with the same and will not alter drainage patterns or increase stormwater runoff. - The project must comply with the City’s “Storm Water and Urban Runoff Pollution Control” (Chapter 16.19 of the city’s Municipal Code) which identifies prohibited discharges and required Best Management Practices (BMPs) for construction and new development. - The City’s regulatory requirements and BMPs, as detailed in the “Stormwater Best Management Practices Manual” published by the City’s Public Works Department, must be implemented, - The project is consistent with the City of Santa Cruz General Plan and will comply with all applicable City regulations and planning division conditions and those of the Regional and State Water Quality Control Boards. - Per state requirements, post-construction runoff flows must be less than the pre-construction flows. Therefore, it is anticipated that the proposed project would not result in erosion, flooding or exceed water quality standards. - Storm Water runoff will not be commingled with sewage. - <i>Verified by: City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017</i> - See Attach P: Land Development
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>3</p>	<p>Earthquake Faults and Earthquake Potential</p> <ul style="list-style-type: none"> - Although several significant earthquake faults are located within 25 kilometers of the project site, the site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. No know surface expression of fault traces is thought to cross the site; therefore, fault rupture hazard is not a significant geologic hazard at the site. - <i>Verified by: Draft Design-Level Geotechnical Investigation prepared by Cornerstone Earth Group, dated May 28, 2021 and Santa Cruz City GIS</i> - The City shall require that the recommendations presented in a final geotechnical report submitted to and approved by the City be incorporated into the project plans and specifications and implemented during construction and, furthermore, all applicable State and local building codes and City of Santa Cruz requirements are required to be complied with. - Complying with the requirements stated above, the project is not expected to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death as a result of geologic hazards including earthquakes, strong seismic ground shaking, or seismic-related ground failure such as liquefaction.

Landslide Potential

- The site is relatively flat and, therefore, there is no landslide potential.

Liquefaction Potential

- The site is not currently mapped by the State of California but is within a zone mapped as having a high to very high liquefaction potential by the City of Santa Cruz per maps in the Santa Cruz GIS system.

- The CEG draft *Design-Level Geotechnical Investigation* for the project identified liquefaction potential as one of the “concerns” to be addressed in development of the project site.

The project will be required to comply with all City and State building codes and requirements set forth in the geotechnical report prepared for the project to reduce the potential for liquefaction.

Tsunami and Seiches Potential

- The project site is located in a mapped Tsunami Inundation Area. The proposed project, though, would not lessen or worsen the potential for tsunami damage, although it may increase in the number of people potentially exposed to tsunami hazards. However, because dangerous tsunamis typically have originated at such a great distance, it is possible to issue fairly long-range warnings of their approach and evacuate people if necessary. The City periodically updates its emergency evacuation procedures for tsunami hazard areas as well as coordination with other agencies as outlined in the City’s adopted Hazard Mitigation Plan would respond to this concern.

- *Verified by California Emergency Management Agency “Tsunami Inundation Map for Emergency Planning Santa Cruz Quadrangle”*

- *Verified by: City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017*

Noise

- The project will temporarily increase community noise levels during construction due to normal noises attributable to construction activities. Noise generated during construction would vary throughout the construction period and on any given day, depending on the construction phase and the type and amount of equipment used at the construction site. The highest noise levels would be generated during grading of the site, with lower noise levels occurring during building construction and finishing. Overall, construction noise levels would be temporary, short-term and fluctuate throughout the construction period.

- Development projects are reviewed on a case-by-case basis, and typical conditions of approval include limiting the day and times of day during which construction and/or heavy construction can be conducted, provision of notification to neighbors regarding construction schedules, and implementation of a process to receive and respond to noise complaints. These are some of the types

of measures that would be implemented by the City to manage and minimize construction noise impact.

- The City has determined that the temporary increase in noise levels generated by construction activity is less than significant.

- The project will generate ongoing noise typical of a multifamily residential project. As a small multifamily residential project, the project will not generate noise levels in excess of City thresholds of 65 CNEL for multifamily projects.

Wildland Fires Potential

- The project site is in an urbanized part of Santa Cruz with no wildland conditions. The project site is not located within a State-identified fire hazard zone as indicated on the latest Fire Hazard and Severity Zone maps prepared by the California Department of Forestry and Fire Protection (CalFire).

Verified by Cal Fire FRAP FHSZ Viewer map

Emergency Response & Access

- The project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project will have no effect on surrounding roadways as it is the redevelopment of five currently developed parcels.

- Verified by: City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017

Hazardous Materials

- A Phase I ESA prepared on the project site identified one onsite CREC and one onsite REC, and one potential offsite REC which are addressed above in the *Contamination and Toxic Substances* factor.

- The project itself will have normal hazardous materials on site that would be commonly found in commercial and personal cleaning supplies and the medical offices will generate some hazardous materials in the form of used medical devices or materials. These offices will be RCRA generators and require proper storage and disposal of hazardous materials in conformation with City and State regulations.

- See the *Contamination and Toxic Substances* factor above and *Mitigation Measures and Conditions* section at the end of this document.

- Verified by Phase I ESA prepared by Weber, Hayes & Associates (WHA), dated July 8, 2022

Construction Site Safety

- Following general construction safety practices, the project site will be fenced during construction and will have signs posted limiting unauthorized access and

		<p>the potential for injury.</p> <p>- See Project Description; Attach F: Contamination and Toxic Substances; and Attach P: Land Development.</p>
<p>Energy Consumption</p>	<p>1</p>	<p>- The project is designed to be all electric and is targeting a LEED Platinum certification – but at a minimum will achieve a LEED Gold certification. Additionally, the non-residential portions of the project will be folded into the LEED certification and meet the overall sustainability criteria for the development. This includes specific requirements for the City of Santa Cruz.</p> <p>The project has several primary climate vulnerabilities – wildfires, heat, and precipitation change. To mitigate local impacts of climate change in the community, Pacific Station North Apartments will incorporate a number of climate adaptation infrastructure, landscape, and built environment features.</p> <ul style="list-style-type: none"> • To protect residents from the deterioration in air quality during wildfires, the building will be designed with a tight building envelope, the ability to disable continuous ventilation, and a minimum of MERV 13 filters on the mechanical systems. • Fire hazard prevention measures include fire resistant outdoor furniture, a class A fire rated roof, fire rated soffits at eaves and balconies, and a 6’ noncombustible vertical zone around the property. • With the number of extreme heat days expected to increase over time, Pacific Station North will take a number of steps to reduce the heat island effect and maintain thermal comfort for its residents, including the installation of an Energy Star rated and Cool Roof Rating Council (CRRC) approved Cool Roof, with high solar reflectivity and R38 insulation. • The Pacific Station North project will increase the permeable surfaces compared to the existing bus transit station. Street trees, landscape planters designed to collect rainwater, and a green roof will provide the opportunity for rainwater to infiltrate into the ground and reduce the likelihood of flooding in an extreme precipitation event. • Pacific Station North has also eliminated on-site parking, which mitigates pollution generated by the private vehicles of residents. • To support the resident’s use of alternative modes of transportation, the ownership entity will provide free transit passes to all residents for a period of three years, more than one secured bicycle parking space per unit, and workshops on bicycle maintenance and commuting. • Limit the use of vinyl and volatile organic compounds (VOCs) in building materials. <p>Onsite solar energy generation to meet the needs of the shared areas.</p> <p>- See Attach 1 – Project Description</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<ul style="list-style-type: none"> - The project will create temporary construction employment, some of which is likely to be drawn from the local employment base. - Additionally, the project may create some new permanent jobs to operate the project and will create additional continuing contracting opportunities for local businesses that may also lead to some job creation, most likely for existing area residents but the effect will be less than significant. - The project will not result in the displacement of existing jobs.
Demographic Character Changes, Displacement	2	<ul style="list-style-type: none"> - The project is too small to instigate any demographic character changes in the community. Additionally, the project is designed to serve existing residents of the project area rather than to attract and bring in new residents. - Development of the project will produce some displacement as the site contains four (4) existing non-residential tenants renting small spaces within the transit center. The businesses include a Mexican restaurant (take-out only), a shop that makes and sells beef jerky, a waffle shop and a small market. The tenants lease between 285 SF –671 SF with rents ranging from \$608 - \$1,758 per month. - Overland, Pacific & Cutler, LLC (OPC) prepared a <i>Pacific Station North Relocation Plan</i>, dated June 3, 2021, which identified the relocation needs and requirements and will implement the relocation plan prior to demolition of the structures on the project site ensuring that both federal and state relocation requirements are complied with. - See Attach Q: Socioeconomic
Environmental Justice	1	<ul style="list-style-type: none"> - As discussed in the <i>Environmental Justice</i> factor above, no adverse environmental impacts were identified in the project’s environmental review that would disproportionately affect this project’s residents. The project is an affordable housing development seeking funding from State and Federal funding sources, each with rent, income and occupant requirements: 32 units will be set aside for extremely low-income (ELI) households, 2 units will be set aside as Manger’s units, and the remaining 94 units will be restricted to very low-income individuals and families; 21 of the ELI units will be rented to families who are homeless or at risk of homelessness and 11 of the ELI units will be designated for families in the Housing Authority’s Family Unification Program (FUP). All 32 ELI units will come with Section 8 Project Based Vouchers so families will not be paying more than 30% of their income for housing; 58 additional units will be set aside for households earning below 50% AMI and 36 units will be set aside for households earning below 60% AMI. <p>This partial permanent supportive housing project is proposed to provide housing and supportive services to an underserved, low-income population, including those</p>

	<p>with special needs, providing both housing and supportive services onsite, and connecting residents as necessary with services and job opportunities offsite.</p> <p>The project is located in a desirable area of the City, downtown near many shops and services, including the transit hub providing convenient access to local amenities, services, employment opportunities, and transportation throughout the city and county and to neighboring counties.</p> <p>The project developer and the City of Santa Cruz have worked cooperatively together to access local and crucial state funding, and a conditional award of federal housing vouchers, to bring this project to fruition, and provide opportunities for low-income and historically marginalized populations to reside in a project that respects them as residents.</p> <p>As noted in the <i>Historic Preservation</i> factor above, the project will have no impact on areas of historic or cultural significance, and is not located on a site or in an area of local historic or cultural significance.</p> <p>Climate change is not anticipated to affect the project or its population in any specific manner other than how it will affect all residents of the region. The project will bring low-income households, including formerly homeless, low-income households with special needs into a holistic environment that will provide both stable, safe and healthy affordable housing, and support for their needs to assist them in healing, accessing health care and other benefits..</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>Educational Facilities</p> <p>- The proposed project retail and commercial space, neither of which will impact educational facilities, and up to 128 units of multi-family housing for low-income residents of the City of Santa Cruz, which could have an impact of educational facilities, though the project is designed to meet the needs of existing residents and is anticipated, therefore, to have minimal effect on surrounding educational facilities.</p> <p>- Schools and educational services are provided to City residents by the Santa Cruz City Schools (SCCS), as well as a number of private schools, for grades K through 12. SCCS is composed of two separate districts: the Elementary District (K-6) and the High School District (7-12), governed by a common board and administration. The Elementary District draws students from the City of Santa Cruz and in County locations including Davenport and Soquel. It includes six schools serving approximately 2,000 students. The second district includes two middle schools, three high schools, an independent studies program and a home school program serving a population of 4,660 students (Santa Cruz City Schools, 2017).</p> <p>- The proposed project would be served by SCCS schools including Westlake Elementary, Mission Hill Middle School, and Santa Cruz High School. The</p>

capacity of each school serving the project is provided in the City's General Plan EIR (City of Santa Cruz 2012). The SCCS study found that enrollment was under capacity and that enrollment is forecasted to decline over the next ten years (Decision Insite, 2016). The study incorporated current enrollment capacity, feeder district data, county birth rates and plans for new housing in the forecasting methodology. Current enrollment data as reported by the State Department of Education was compared to capacity as reported in the City's General Plan. The middle school and high school have enrollments that are under capacity based on data reported by the state (California Department of Education, 2017).

- Local school districts are empowered under state law to impose school impact fees, which are collected by local governments at the time of building permit issuance. The Santa Cruz City Elementary and High School Districts currently charge school impact fees.

- *Verified by: City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017*

Cultural Facilities

- The proposed project may potentially result in an increase in demand on or for cultural facilities in the City of Santa Cruz and the surrounding areas of the County but, due to the relatively small project size and that the project is proposed to serve existing area residents, the increased demand is not expected to exceed the capacity of existing facilities. There are adequate cultural facilities in the City and surrounding areas to accommodate any potential increased usage generated by the project.

- The City of Santa Cruz, along with the County of Santa Cruz and other nearby communities showcase an array of talent through its art galleries, museums, festivals, and outdoor theater performances. Premier cultural events like Open Studios, Santa Cruz Shakespeare, the Scotts Valley Art & Wine, the Capitola Art & Wine Festival, Capitola Twilight Concerts, Cabrillo Festival of Contemporary Music, the Santa Cruz Film Festival and others draw visitors to this vibrant, eclectic area. The City and County offer countless cultural events and venues offering live music, outdoor theater and more

- The City of Santa Cruz is known as a tourist attraction and is located on Monterey Bay with another major tourist attraction with numerous cultural facilities, Monterey/Carmel, to the south. These and other nearby cities offer a wealth of cultural activities. There are also miles of nature trails around the Santa Cruz coastal wetlands.

- The Santa Cruz County Fairgrounds, located in the south of the County in the City of Watsonville, shares its location with the Agricultural History Museum and the Sierra Azul Sculpture Garden and Nursery.

- Cabrillo Community College is located in the town of Aptos, just outside of Santa Cruz while the University of California, at Santa Cruz is located in the City.

- There are 22 properties located in the City and 47 properties located in the County of Santa Cruz that are listed in the National Register of Historic Places.

		<ul style="list-style-type: none"> - “The City has approximately 35 City-listed historic landmarks and approximately 600 listed historic structures, some of which may also be considered scenic resources depending on the visual prominence and the character of the building (City of Santa Cruz, April 2012, DEIR volume). In downtown, the Civic Center, Town Clock are identified as visual landmarks in the City’s General Plan. The Boardwalk and Santa Cruz Wharf are identified as landmarks in the beach area, . . .” - <i>Extracted from City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017</i> - Additionally, there is adequate public transportation serving these cultural facilities. - See Attach R: Community Facilities & Services
Commercial Facilities	1	<ul style="list-style-type: none"> - The proposed project will potentially benefit nearby businesses as a result of increased business. Additionally, placing residents in more affordable housing provides more disposable income for spending on hard and soft goods. - The project will include up to 5,817 SF of retail space on the ground floor and 3,500 SF for METRO Ticketing and Operations. - Additionally, the project is not expected to negatively impact other businesses farther out from the project by significantly reducing current demand for their services. Commercial facilities in the vicinity of the project site and further out are reasonably accessible to residents by private or public transportation. The City has a robust public transportation network and the project includes the construction of a new central Metro bus terminal with buses serving the entire City, County and with buses to surrounding counties. - See Attach R: Community Facilities and Services

Health Care

- The proposed project is not expected to significantly impact demand for health care services in the area. Sufficient health care services are available in the City of Santa Cruz and areas around the City to handle any potential increased demand. Due to the relatively small size of the project (128 units), the net impact will be low and less than significant.

- Additionally, the City anticipate that the majority of future project residents currently reside in the area and, therefore, there is anticipated to be little to no net increase in demand for health care services.

- The Palo Alto Medical Foundation, a division of Sutter Health, is located at 2025 Soquel Avenue, approximately 2.0 miles from the project site, and provides Urgent Care services. A second facility at 1301 Mission Street is located approximately 1.1 miles via street from the project site.

- Dominican Hospital of Dignity Health is a full service hospital located at 1555 Soquel Drive, approximately 2.9 miles from the project site. Dominican provides financial assistance as needed, providing \$29 million in fiscal year 2020 for patient financial assistance and community benefit programs.

- See included maps depicting the many medical facilities and offices in the area.

Social Services

- Due to the relatively small size of the proposed project (128 units), the project is not expected to significantly increase demand for social services.

- Additionally, as noted previously, the project is expected to provide affordable housing for households already residing within the project area and, therefore, there would be little increase in demand for services generated by the project. For any potential increase in City residents generated by the project, such services as are needed are offered in a wide variety by both public agencies and private non-profit agencies in both the City of Santa Cruz and County of Santa Cruz.

- Social Service agencies and programs in the area include Santa Cruz Child Support Services, Court Community Service Program, Encompass Community Services, Santa Cruz County CalFresh, Santa Cruz Child Protective Services, Salvation Army, Housing Matters, Santa Cruz Supported Living, Mental Health Client Action Network, Hope Services, Head Start and more.

- **See Attach R: Community Facilities & Services**

Solid Waste
Disposal /
Recycling

2

- Solid waste collection and disposal, including recycling services, are provided by the City of Santa Cruz to residents, businesses and institutions within the City's boundaries, is provided at the Resource Recovery Facility (RRF), which includes a sanitary landfill, recycling center, green waste drop-off area, and Household Hazardous Waste Drop-Off Facility. The City owns and operates this facility, including a Class III sanitary landfill, which is located approximately three miles west of the City off Highway 1 on Dimeo Lane. The site covers 100 acres with approximately 70 acres available for disposal use, and the City's RRF. The RRF only accepts municipal solid waste and serves as a sorting facility to remove any recyclable or composting materials. The Recycling Center accepts a variety of recyclable materials.

- In the mid-1990s the permitted disposal area of the landfill increased from 40 to 67 acres. The additional acreage was designed with a liner system that meets EPA requirements for new municipal solid waste landfills. The new area replaced the former leachate evaporation ponds, which were cleaned and closed in 1997. The expansion increased the life of the landfill by approximately 30 years at that time, but the lifespan has been increased through implementation of additional waste reduction measures (City of Santa Cruz, April 2012, DEIR volume).

- The City of Santa Cruz met the state-mandated waste diversion goals of 25% of their 1990 waste-streams from landfill disposal by 1995 and 50% by 2000 through community education and the implementation of expanded curbside recycling programs. In the year 2000, the City established a Zero-Waste goal with the ultimate intention of eliminating the City's need for a landfill. As of 2015, the City had achieved a diversion rate of 65-68%, which exceeds the state requirements (City of Santa Cruz, April 2012, DEIR volume).

- Assuming growth trends similar to the past 10-15 years in the City of Santa Cruz, the RRF has more than adequate capacity to accommodate all municipal solid waste generated by City residents, visitors and businesses. Based on continued waste reduction, annual aerial surveys, and calculations, the landfill is estimated to have capacity through the year 2056 (City of Santa Cruz, April 2012, DEIR volume). State law requires that facilities begin planning for future waste disposal/reuse facilities at least 15 years in advance of existing landfill closure dates, which would be around the year 2043.

- *Extracted from the City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017*

- Per the above the proposed project will generate additional solid waste but, is not expected to exceed the City's ability to collect or recycle solid waste.

- The project is expected to comply with statutes and regulations related to solid waste, similar to other residential developments in the area. No known project elements would create unusual solid waste conditions.

- During construction: "All refuse and recycling activities . . . shall be done in accordance with Chapter 6.12 of the Santa Cruz Municipal Code. Be aware that private companies offering refuse or debris box services are not allowed

		to operate within the City limits, except under certain limited circumstances detailed in Chapter 6.12.160.”
Waste Water / Sanitary Sewers	2	<p>- The City of Santa Cruz will provide wastewater treatment for project generated wastewater. The project will not exceed wastewater treatment requirements as established by the Regional Water Quality Control Board.</p> <p>- The City of Santa Cruz owns and operates a regional wastewater treatment facility (WWTF), located on California Street adjacent to Neary Lagoon, that provides secondary level of treatment. The City treats sewage from domestic and industrial sources and discharges the treated effluent into the Pacific Ocean under the provisions of a waste discharge permit (NPDES No. CA0048194) issued by the California RWQCB, Central Coast Region (Order No. R3 - 2005 - 0003).</p> <p>- The WWTF has a permitted wastewater treatment capacity of 17.0 million gallons per day (mgd). In 2016, the WWTP treated 3.3 billion gallons of wastewater effluent at an average daily rate of 9.04 mgd (Ibid.). The Santa Cruz County Sanitation District has treatment capacity rights of 8 mgd at the City of Santa Cruz WWTF. The City contributes approximately 5.0 mgd with a remaining capacity of 4.0 mgd. The Sanitation District contributes 5.5 mgd with a remaining capacity of 2.5 mgd. Approximately 50% of the wastewater treated at the plant is generated within the City of Santa Cruz. The total remaining treatment plant capacity, therefore, is 7.5 mgd.</p> <p>- The project will not require or result in the relocation or construction of new public or private utilities and service facilities.</p> <p>- <i>Extracted from the City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017</i></p>
Water Supply	2	<p>- The City of Santa Cruz will supply water to the project and has adequate water supplies available to serve the proposed project.</p> <p>- Per the City’s 2020 Urban Water Management Plan, “The City is safeguarding against future water shortages by actively implementing future water projects as described in Chapter 6, Section 6.8 [of the Plan]. Implementation of these projects is therefore assumed in the City’s water supply planning process.”</p> <p>“Under this supply and demand reliability assessment, the City projects having sufficient water supply available in normal years and single dry years to serve anticipated demand throughout the 2025 – 2045 planning period.</p> <p>Under multi-year drought conditions in the near term (2025), with proposed water rights modifications but before implementation of the ASR and planned infrastructure projects, available supplies would meet projected demand in years one through four of the multi-year drought scenario, but would fall short of demand by 27 percent in year five.”</p> <p>- In reality, the amount of rainfall in any given year, the number of non-drought years in succession, and the number of drought years in succession, cannot be predicted with accuracy so modeling is done using the best data available.</p>

		<p>Additionally, although the population in the area has been increasing, gross water usage has been dropping.</p> <p>- Per the Conditions of Approval for the project: “Adequate provisions shall be made to supply water to the premises covered by this application. The design of water facilities shall be to standards of the Water Department, and plans therefore must be submitted to the Water Department Director for review and approval prior to the issuance of a building permit.”</p> <p>- See Attach R – Community Facilities and Services</p>
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p>2</p>	<p>Public Safety - Police</p> <p>- The City of Santa Cruz Police Department provides crime protection and prevention activities throughout the City, including patrols, response to calls, education and community outreach. Its range of services include patrol, investigations, traffic, parks unit, neighborhood enforcement team, gang unit, dive team, hostage negotiation team, tactical team and School Resource officer. The City has mutual aid agreements with county law enforcement (Sheriff’s Office, Capitola, Scotts Valley, Watsonville, California Highway Patrol, State Parks and UCSC Police Departments).</p> <p>- The Police Department operates out of one police station/headquarters, located in downtown. The city is divided into five patrol beats that are designed to maximize coverage and provide efficient response to calls for service: West, East, Beach, Central, and Downtown (City of Santa Cruz Police Department, 2015). The Department has divided the City into five main beats, and handled 103,592 calls in 2015. Approximately 40% of the annual calls are for service in the Downtown area 2017 (Martinez, personal communication, May 2017). The average response time is four minutes, 22 seconds, which is under the department’s target of four minutes, 30 seconds. Dispatching services are provided through the Santa Cruz Consolidated Emergency Communications Center.</p> <p>- Although the project has been proposed to provide affordable housing for existing City residents, the project could potentially result in increased population that could result in increased police protection service demands. However, this project and other future development and growth that may result from the Downtown Plan is not anticipated to result in the need to construct new or expanded police facilities.</p> <p>- <i>Extracted from the City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017</i></p> <p>Public Safety - Fire</p> <p>-The project will be served by the City of Santa Cruz Fire Department. Per the Downtown Plan DEIR: “The City of Santa Cruz Fire Department is an all hazard emergency response and fire protection agency that serves the City, the University of California at Santa Cruz (UCSC), and participates in mutual aid responses within the County and State. The Fire Department also provides various contract services within the County. Agreements include a long-term contract for full fire protection services with UCSC, specialized arrangements for seasonal lifeguards</p>

with the City of Capitola and the Santa Cruz Port District, and an automatic aid agreement with County Fire/CalFire into Paradise Park. The City of Santa Cruz Fire Department maintains mutual aid agreements with all surrounding fire agencies to provide, and receive, aid on an as needed basis. The department is also a participant in the California Fire Assistance Agreement (CFAA) which allows for statewide mutual aid.

The Fire Department provides a variety of services which include fire protection, marine rescue, technical rope/cliff rescue, advanced life support/paramedic, and hazardous materials emergency response. In addition, the department serves the community through a wide array of nonemergency interactions by providing fire prevention, community risk reduction, public education, disaster preparedness training, and ongoing emergency management preparation.”

- Fire Station #1 at 711 Center Street is within the downtown area and is closest to the project site. Discussions with Fire Department staff in May 2017 indicated that the downtown facility is “inadequate for equipment, personnel, and storage.”

- “The number of service calls received by the fire department in 2016 was approximately 8,200 calls. The majority of the calls are for non-fire emergencies, with about 65% of the calls being for medical assistance. Average response times from each of the four fire stations is approximately 5 minutes. The Department’s goal is to respond to emergency medical calls in less than five minutes 90% of the time and to fire emergency calls within eight minutes 90% of the time.”

- Per the Downtown Plan DEIR, “increased population density associated with potential new development accommodated by the Plan that would result in increased fire protection and emergency service demands. Existing and future development and growth within the City would result in the need to construct new or expanded fire stations, however, the impacts of fire station construction or expansion are not expected to be significant.”

- *Extracted from the City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017*

Public Safety – Emergency Medical Services

- As discussed above under *Public Safety – Fire*, emergency medical services are provided by the City of Santa Cruz Fire Department and the marginal increase in demand this project may produce will have the same limitations and impacts as discussed above.

Parks, Open Space and Recreation	2	<p>- The City of Santa Cruz offers residents a wide range of parks, open space, beaches, trails, and recreational opportunities. The operates and maintains a range of neighborhood parks, community/regional parks, community facilities, and recreational programs. Most of these parks, facilities and programs are operated and maintained by the City Parks and Recreation Department. Some facilities and programs are operated and organized in partnership with community organizations.</p> <p>- The City has responsibility for manages, maintains and operates more than 30 parks which comprise over 1,700 acres of parks and open space lands, including various community/recreational facilities.</p> <p>- The City imposes a “Parks and Recreation Facilities Tax” (pursuant to Chapter 5.72 of the Municipal Code) on new residential development (including mobile homes) within the City, payable at the time of issuance of a building permit. The collected taxes are placed into a special fund, and “shall be used and expended solely for the acquisition, improvement and expansion of public park, playground and recreational facilities in the city” (section 5.72.100).</p> <p>- <i>Verified by: City of Santa Cruz Downtown Plan Amendments Draft Environmental Impact Report, dated July 2017</i></p> <p>- City residents also have the opportunity to access many state and county park facilities. - The County of Santa Cruz Department of Parks, Open Space, and Cultural Services operates a total of 49 parks, which total over 1,200 acres of parkland in unincorporated Santa Cruz County. County parks include dog parks, garden plots to rent, surf schools and an adopt-a-beach program. Coastal access points within the County are shown on the County website along with a list of parks and a listing of all the features at each park. The closest County park to the planning area is the Pinto Lake Park, which is located approximately two miles north of the planning area, along Green Valley Road. The park is approximately 294 acres in size. The County manages a 216-acre portion in the northern portion of the park and the City of Santa Cruz manages a 78-acre portion of the park.</p> <p>See Attach R: Community Facilities and Services</p>
Transportation and Accessibility	2	<p>Accessibility</p> <p>- The project is required to and will meet all Federal, State and Local regulations governing accessibility.</p> <p>- The Santa Cruz Metropolitan Transit Districts (SCMTD) Pacific Station, its main depot, is located at 902 Pacific Avenue and is being demolished and rebuilt as part of this project. The Metro provides fixed-route and commuter bus service for the City of Santa Cruz and Santa Cruz County throughout the year. The entire system can be accessed from this location with at least 18 bus routes originating from this location providing access to the entire County and surrounding counties.</p> <p>See Attach R: Community Facilities and Services</p> <p>Transportation</p>

Temporary Impacts

- There will be a temporary increase in traffic from contractors building the project; however, this impact is temporary in nature and does not constitute a permanent impact.

Permanent Impacts

- The project will have approximately 5,817 SF of ground floor commercial space and approximately 3,500 SF for METRO Ticketing and Operations, residential mail room, bike room and utility spaces on the ground floor. Floors 2-7 will contain the housing. The project will have no required commercial or residential parking in order to promote alternative modes of transportation including the use of mass transportation versus personal cars; therefore, the project will have minimal permanent impacts on city street usage but will increase transit usage per design. There will be a 865 SF public bicycle hub and a 1,460 SF bicycle hub that can accommodate 128 bicycles to serve residents. Residents will be provided with a free annual Metro bus pass for the first three years after the project is leased up.

- The project does not include any on-site parking. The project meets the criteria for incentives provided in AB2162, one of which is that a development is not required to provide residential on-site parking if it is located within one-half mile of a major transit stop. The project site is located directly adjacent to the Metro Center; therefore, no on-site parking is required to serve the residential uses and units. The project is also not required to provide on-site parking spaces to serve the commercial uses. Chapter 4, Section B(5) of the Downtown Plan indicates that projects that provide the full 20 foot setback from the edge of the 10-foot wide Maple Street alley right-of-way are not required to provide on-site parking, however, they are subject to the payment of in-lieu fees towards Parking District #1. The project includes 6,000 SF of commercial space and 2,970 SF of office space for METRO. The Downtown Parking District requires a blanket parking ratio of 1 space per 400 square feet for all commercial uses unless otherwise specified in Resolution NS-29,538. Therefore, the parking requirement for the commercial and Metro square footage is 23 spaces. Project will meet the commercial parking requirement through an IIG Program funded in-lieu fee to implement traffic improvements on Front St.

- *Verified by: Ellen Morris, Eden Housing*

See Attachment 1 Project Information

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<p>Unique Natural Features</p> <ul style="list-style-type: none"> - The project site is flat with no unique natural features and currently contains commercial buildings and parking lots. - <i>See Project Information, Aerial photos and USGS Map</i> <p>Water Resources</p> <ul style="list-style-type: none"> - The project will be connected and served by the City’s water system and any minimal landscaping will be irrigated with domestic water or reclaimed water. Furthermore, implementation of the project would not deplete groundwater supplies or interfere with groundwater recharge resulting in groundwater loss. - <i>See Water Supply factor above</i> - See “Soil Suitability/ Slope / Erosion/ Drainage / Storm Water Runoff” factor above for information on the issue of storm water runoff. - See the “Waste Water / Sanitary Sewers” factor above for information on the issue of Waste Water collection and treatment. The project will not utilize an on-site septic system. - See Attach I: Farmland Preservation and USGS map
Vegetation, Wildlife	2	<p>Vegetation</p> <ul style="list-style-type: none"> - The project site is located in downtown Santa Cruz, a built-up urban area, in between two main streets and is fully developed with structures and hardscape with no vegetation. - Urban Tree Management Inc. (UTM) prepared an Arborist Report for the project, dated April 13, 2021. UTM surveyed 44 trees, 18 of which are protected under the City’s tree ordinance. Three (3) unprotected trees were recommended for removal. The report outlines the City’s tree protection requirements, the condition of all of the trees on the site, and provides recommendations for tree protection measures to be taken during construction, including consultation with the project arborist before trenching and other activities that may damage trees or tree root systems. <p>Wildlife</p> <ul style="list-style-type: none"> - Due to the site being located downtown and fully developed with structures and hardscape, with no vegetation on the site, there is no wildlife to be affected by development of the project. - See Attach S: Vegetation, Wildlife and Attach 2 Maps and Photos

Other Factors	2	- N/A
Climate Change Impacts	2	<p>- The area is not generally subject to hurricanes or extreme storms and is in a temperate area not subject to extreme heat or cold. It is outside of any state- or County-designated wildfire hazard zones, and has no potential for landslides. The most significant issues in respect to climate change that may potentially affect this project or be affected by this project are tsunamis, sea level rise, drought (water resources), and seismicity. The site is located in the north Monterey Bay Area, which is subject to earthquakes that may cause strong ground shaking, but every property in the area, as well as most of California, faces very similar risks of drought and earthquakes. Many of the project’s residents, if not for the project, would either be living on the street or in other, likely less-safe structures. Similarly, they would be more at risk for each of those factors.</p> <p><i>Drought (Water Resources)</i> – California and the western United States are currently experiencing drought conditions, and California has for the majority of the last 10 years. This project is not proposing to bring new residents into the area, resulting in a negative effect on water resources. Instead, the project will provide safe, affordable housing for currently homeless and/or at-risk people already residing (unsheltered or in unstable/unsafe housing) within the County, selected from the County Continuum of Care’s Coordinated Entry list. Construction of the project is not anticipated to result in any additional effect on drought conditions and water resources in the region or in California. In addition, as noted above, the project will meet state and local requirements for water-efficiency in the project’s plumbing fixtures and landscape design.</p> <p><i>Seismicity</i> – As noted above, the project site is located in the northern Monterey Bay Area, a seismically active region, and is likely to be subject to strong ground shaking. To address this, the project will be built in accordance with the CBC to address the issue. While there is no established connection between climate change and large earthquakes, there has been research establishing a connection between water load on the earth’s surface and absorbed, and micro-seismicity (earthquakes too small to be felt) and localized earthquakes tied to water level fluctuation in dams. There is some research suggesting that there may be a connection to long-term drought and excessive groundwater pumping and seismicity, but a firm understanding has not yet been reached as to any connection to large earthquakes.</p> <p><i>EPA EJSscreen Climate Change Factors</i></p> <p>The EPA EJSscreen includes a section on Climate Change that looks at six (6) Factors: 100 Year Floodplain; Coastal Flood Hazard; Drought; Sea Level Rise; Wildfire Hazard Potential and Flood Risk. The following are the EJSscreen Climate Change Factors for the project site.</p> <p>100 Year Floodplain – This factor estimates that the entire site will be within the 100-year floodplain. This is accurate except that when the current flood control improvements are complete and certified the project will be within the 100-year floodplain but protected by levee.</p>

		<p>Flood Risk – Related to the above, this factor estimates that the site will have a 80% - 90% chance of flooding. In addition to the site to be protected by levee, the ground floor will be floodproofed to 2’ above the base flood elevation offering increased protection to the potential for flooding.</p> <p>Sea Level Rise – This factor estimates the effects of sea level rise in one foot increments from 1’ to 6’. The factor does not estimate any level within this range of affecting the site.</p> <p>- The City of Santa Cruz has also mapped sea level rise and estimates a 5.2’ sea level rise by the Year 2100, with small portions of the site affected.</p> <p>Wildfire Hazard Potential – Indicates that the entire site is projected to be below the National and State 50th percentile for fire hazard. The project site is currently not classified as being in a fire hazard severity area by Cal Fire. Additionally, the site and structures will be built to meet all local and state fire codes and requirements to reduce susceptibility to fire danger and loss,</p> <p>Coastal Flood Hazard – This factor indicates no coastal flood hazard for the site.</p> <p>Drought – The Factor map indicates how drought conditions have changed across small regions, called Climate Divisions, from 1900 to 2020 measured as moisture levels. The map indicates that moisture levels have declined on average in the region from between 0.5 and 0.25 in that time period, with the State is currently in the third year of drought conditions.</p> <p>- See Attach R – Climate Change</p>
Energy Efficiency	1	<p>The project helps reduce greenhouse gases due to a significant portion of the population that will be housed having fewer cars than a traditional residential project and the site being conveniently located near a transit line that provides access to the entire region, reducing the need for travel by car. The project will also include bicycle parking spaces to encourage bicycle use. The site is within walking distance of many services. Additionally, the supportive services that will be provided on-site to residents will reduce the need to travel off-site for such services. As such, the site meets the City’s standards for residential vehicle miles travelled, as it is within convenient walking, biking and public transit distance of many local employment opportunities, shopping and retail services, and schools.</p> <p>- The project will be a 100% electric building in compliance with the recently adopted City of Santa Cruz ordinance: Chapter 6.100, effective July 1, 2020, and the project will comply with Title 24 requirements for energy efficiency.</p> <p>- Units will have Energystar appliances including refrigerators, oven and ranges, and dishwashers.</p> <p>- The project site is located in a moderate temperate zone near the ocean, with multiple city parks and public beaches near the project site.</p> <p>The Santa Cruz Water District has developed water efficiency requirements for single-family and multifamily housing that the project is required to implement to reduce water use within the project site. . Specifically, the project will install</p>

		<p>fixtures that protect the area’s water resources through more efficient water use efficiency requirements, examples of which are listed below:</p> <ul style="list-style-type: none"> • All installed toilets use 1.28 gallons per flush or less. • Kitchen faucets use a maximum of 1.8 gallons per minute. • Residential bathroom faucets use a maximum of 1.5 gallons per minute or are WaterSense qualified. • Showerheads use a maximum of 2.0 gallons per minute or are WaterSense qualified. • Clothes washing machines are Energy Star qualified. • Dishwashing machines are Energy Star qualified. • Separate meters are required for each multi-family residential unit. • Dedicated landscape water meters. • Landscaping turf must be a water conserving species and may not be used in areas less than 10 feet wide or on slopes greater than 12%. • Turf, moderate to high water use plants and water features are limited to no more than 25% of the landscaped area.
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Additional Studies Performed:

No additional studies were prepared and utilized for the preparation of this NEPA other than those referenced in specific factors and below.

Field Inspection (Date and completed by):

Field Inspections were done by the preparers of reports used in this NEPA including:

- Weber, Hayes & Associates, Phase I ESA – October 9, 2013; March 17, 2019; April 7, 2020; April 20, 202; January 26, 27, 2023
- Cornerstone Earth Group, Preliminary Geotechnical Design Summary – February 16, 24, 25, 2021
- CMS Environmental Services, Limited Asbestos and Lead-Based Paint Sampling – August 9, 10, 2023
- Thorburn Associates, Acoustical Measurement Results – October 27, 28, 2021
- Salter, Environmental Noise Study – August 31 – September 1, 2023
- Urban Tree Management, Inc., Arborist Report – April 13, 2021

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

The following were used for each item as applicable:

- USGS, Santa Cruz West Quadrangle 7.5-Minute series topographic map
- Google Earth and Google Maps

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6

Airport Hazards

- 24 CFR Part 51 Subpart D
- Santa Cruz GIS Airport Zones Map
- NEPA Assist Airport Map
- Google Earth

Coastal Barrier Resources

- Coastal Barrier Resource System Mapper

Flood Insurance

- FIRM map 06087C0332E dated May 16, 2012

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

Clean Air

- EPA Greenbook “Currently Designated Nonattainment Areas for all Criteria Pollutants at <https://www3.epa.gov/airquality/greenbook/ancl.html#CALIFORNIA> downloaded 1.27.21

Coastal Zone Management Act

- California Coastal Zone Map downloaded from <https://www.coastal.ca.gov/maps/czb/> downloaded 1.27.21

Contamination and Toxic Substances

- Weber, Hayes & Associates – Phase I ESA, dated June 6, 2021
- Weber, Hayes & Associates – Phase I/II ESA, dated November 25, 2013
- Weber, Hayes & Associates – Phase I/II ESA, dated July 23, 2002
- Weber, Hayes & Associates – Draft Remedial Action Plan, 425 Front Street, dated July 1, 2010
- Weber, Hayes & Associates – Off-Site Vapor Intrusion Investigation, dated September 19, 2023
- Department of Toxic Substances Control – Approval of RAP, 425 Front Street, dated July 1, 2010
- County of Santa Cruz Health Services Agency – Performance of Remedial Action and Investigation, Pacific Station, 920 Pacific Ave., dated October 8, 2014
- Operation and Maintenance Agreement between DTSC and Santa Cruz Metro Transit District, 425 Front Street, dated February 28, 2011
- Land Use Covenant, 425 Front Street, dated March 2011
- Envirostor
- Geotracker
- Adanta Inc. by CMS Environmental Services – Limited Asbestos and Lead-Based Paint Sampling, 333 Front Street, dated August 14, 2023
- Adanta Inc. by CMS Environmental Services – Limited Asbestos and Lead-Based Paint Sampling, 920 Pacific Avenue, dated August 17, 2023 – Revised September 9, 2023
- Adanta Inc. by CMS Environmental Services – Limited Asbestos and Lead-Based Paint Sampling, 920-2 & 920-4 Pacific Avenue, dated August 14, 2023

Endangered Species Act

- USFWS – Critical Habitat for Threatened & Endangered Species downloaded 1.27.21
- City of Santa Cruz General Plan, 2030 Draft EIR, dated September 2011
Including *Figure 4.8-3 Sensitive Habitat Areas*

Explosive and Flammable Hazards

- CalEPA Database: <https://siteportal.calepa.ca.gov/nsite/map/help>
- HUD Exchange, ASD Tool at <https://www.hudexchange.info/environmental-review/asd-calculator/>
- Google Earth

Farmlands Protection

- USDA, NRCS website at <https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm> downloaded 1.27.21

Floodplain Management

- FIRM map 06087C0332E, dated May 16, 2012

Historic Preservation

- Ms. Julianne Polanco, State Historic Preservation Officer
- California Historical Resources Information System
- PAST Consultants, Inc. – Historic Evaluation of Front Street and Pacific Avenue Properties, dated 12.2.20
- Native American Heritage Commission
- Tribal Directory Assessment Information – Contact Information for Tribes of Santa Cruz County, CA
- Consultation letters to all on the NAHC Contacts List on 1.29.21
- Michelle Zimmer, Enrollment and Communications Officer of the Amah Mutsun Tribal Band of Mission San Juan Bautista – email response received 2.2.21
- National Register of Historic Places (NRHP) Records Search
- City of Santa Cruz Draft EIR, Downtown Plan Amendments – Section 4.4, dated July 2017
- Basin Research Associates – Archaeology Review - City of Santa Cruz Application CP17-0065
- The USGS, Santa Cruz Quadrangle 7.5-Minute series topographic map
- Google Aerial Photos

Noise Abatement and Control

- Watsonville Airport Noise Contours Map
- NEPAssist Railroad Map
- City of Santa Cruz General Plan, 2030 Draft EIR, dated September 2011
Including *Figure 4.13-1 Current Noise Contours, Figure 4.13-1 Future Noise Contours and Figure 4.4-4*
- City of Santa Cruz General Plan, Noise Element Update, dated 30 September 2007
- City of Santa Cruz Noise Ordinance
- Google Earth

Sole Source Aquifers

- EPA Region 9 Sole Source Aquifers Map downloaded from <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/> downloaded on 1.27.21

Wetlands Protection

- Wetlands Map downloaded from <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/> downloaded on 1.27.21

Wild and Scenic Rivers Act

- Wild and Scenic Rivers list downloaded from <https://www.rivers.gov/river-app/index.html?state=CA> on 1.27.21

ENVIRONMENTAL JUSTICE

Environmental Justice

- US EPA – EJScreen Report (Version 2.0)

Environmental Assessment Factors

- NEPAssist
- City of Santa Cruz General Plan 2030 Draft EIR, dated September 2011
- City of Santa Cruz Draft EIR, Downtown Plan Amendments, dated July 2017
- City of Santa Cruz Noise Ordinance
- City of Santa Cruz Website
- County of Santa Cruz GIS Maps
- City of Santa Cruz Public Works Website
- City of Santa Cruz Wastewater System
- City of Santa Cruz
- City of Santa Cruz Zoning Lookup for Street Addresses within the City
- City of Santa Cruz General Plan Housing Element
- City of Santa Cruz Parks Master Plan
- County of Santa Cruz website – Parks
- City of Santa Cruz 2015 Urban Water Management Plan
- City of Santa Cruz Water Conservation Master Plan, dated January 2017
- Weber, Hayes & Associates, Phase I ESA, dated June 6, 2021
- Cornerstone Earth Group, Design Level Geotechnical Investigation, dated May 28, 2021
- USDA, NRCS website at <https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- California Department of Conservation regulatory maps viewed or downloaded from:
<http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>
- California Emergency Management Agency – Tsunami Inundation Map for Emergency Planning
- Cal Fire – Fire Hazard Severity Zones in SRA & LRA
- USFWS – Critical Habitat for Threatened & Endangered Species downloaded 1.27.21
- City of Santa Cruz General Plan, 2030 Draft EIR, dated September 2011
Including *Figure 4.8-3 Sensitive Habitat Areas*
- Summary of Front Street Riverfront Development Standards
- Summary of Pacific Avenue Retail District Development Standards
- MTS Master Transportation Study, VI-9 Regional Planning
- Santa Cruz Metropolitan Transit District (METRO) website
- Overland, Pacific & Cutler, LLC – Pacific Station North Project Relocation Plan, dated June 3, 2021
- Urban Tree Management Inc. – Arborist Report, dated April 13, 2021
- Google Earth
- Google Maps

List of Permits Obtained:

No permits obtained at this time. Standard construction-related permits will be obtained prior to the commencement of construction.

Public Outreach [24 CFR 50.23 & 58.43]:

- Consultation letters and responses mailed to tribal contacts and the State Historic Preservation Officer
- Santa Cruz City Council on 1.26.21 and 2.9.21
- Coastal Commission on 4.15.21
- Zoning Administrator/Coastal Permit Approval on 6.2.21
- Numerous Community Meetings and online resources as plan was developed beginning in 2011 and accelerating from 2015 (see Community Tracker)

Cumulative Impact Analysis [24 CFR 58.32]:

No Factors in this Environmental Assessment were found to be significant on a stand-alone basis; and there are no other activities functionally or geographically related to this project requiring aggregation with this action – i.e., there are no other activities that are similar, connected and closely related, or that are dependent upon other activities and actions, and, therefore would need to be aggregated and evaluated with this activity (See 40 CFR 1508.25(a)); and; there are no cumulative impacts when considering all factors as a whole that would result in the Finding being other than **No Significant Impact**.

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

The City of Santa Cruz (“City”) issued a Request for Proposal (“RFP”) for this site. It was described as a mixed-use TOD development project on City owned and Santa Cruz Metropolitan Transit District (METRO) owned parcels on the north side of Maple Alley at Pacific Station (see Exhibit A). The RFP is part of a larger redevelopment of the downtown Santa Cruz METRO Station area that will include a redesigned METRO Transit Station with housing and commercial/retail. The City and METRO sought proposals from interested parties in the City’s Qualified Pool of affordable housing and mixed use developers to quickly develop preliminary plans for development of the site and to apply for funding with the City and METRO.

The project developers, For the Future Housing and Eden Housing, proposed this project in response to the RFP. As the proposed project is consistent with the RFP requirements and the City of Santa Cruz’s General Plan and meets a significant City-identified need in respect to the provision of affordable housing for low- and very low-income residents of the City and placing residents near the city core of services and transportation. Consideration of other alternatives to the proposed site were not considered as the RFP was site specific.

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

There are few benefits to be obtained by not developing the site as proposed. The project will increase the much-needed supply of housing in the project area with existing public infrastructure and without significantly impacting existing public services. Not developing this particular project will delay the development of much needed affordable housing needed in the community and may not provide affordable housing as this project will do. Additionally, the METRO transit station is centrally located in the heart of the downtown with easy access for future residents and commuters to jobs and school so it would cause an undue burden (enviro justice impact?) to relocate the station somewhere farther away.

Summary of Findings and Conclusions:

The City of Santa Cruz finds that the project will have no significant effect on the quality of the human environment. In several areas, implementation of City and other agency required measures during construction, along with other conditions required for City approval of the project, will not only result in the project having no significant impact on the quality of the human environment but will have a beneficial impact in several areas including the provision of affordable housing for city residents in the city core near services and transportation.

The project will benefit the City of Santa Cruz and low-income residents needing affordable rental housing by providing quality low-income housing without exposing residents to hazardous environmental conditions and will improve their quality of life.

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.

Law, Authority, or Factor	Mitigation Measures and Conditions
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><i>According to FIRM map 06087C0332E dated May 16, 2012, the project site is located in Zone A99 a “Special Flood Hazard Area Without Base Flood Elevation (BFE)” determined.</i></p> <p><i>- Flood insurance is available and is required due to construction within the flood zone.</i></p>
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><i>- Prior to issuance of a building permit for the project, the applicant shall provide the Zoning Administrator with written verification that all permit requirements of the Monterey Bay Unified Air Pollution Control District relative to asbestos investigation and disposal, if necessary, have been fulfilled in accordance with Federal, State and local laws.</i></p> <p><i>- During ground-disturbing activities, including demolition and grading, construction, sensitive receptors will potentially be subject to increased pollutant concentrations, primarily from blowing dust associated with ground disturbances and construction equipment emissions. The effect will be mitigated by requiring the developer to comply with the City’s dust control program and Monterey Bay Unified Air Pollution Control District regulations.</i></p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p><i>1) Based on the presence of elevated concentrations of residual benzene in subsurface soil vapor, we recommend a Vapor Intrusion Mitigation System (VIMS) be incorporated within the foundation design plans.</i></p> <p><i>2) 920 Pacific Avenue, has 4% chrysotile asbestos on the undercoating of a sink (approximately 8 SF) which will need to be mitigated in accordance with all applicable local, state and federal regulations.</i></p> <p><i>3) Two doors “were found to contain a concentration of lead that was greater than the laboratory detection limit by weight but less than the HUD definition and is considered to</i></p>

	<p><i>be a Lead Containing Paint and contractors should utilize "lead safe" work practices when disturbing this paint."</i></p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><i>Condition of Approval</i></p> <p><i>- Plans submitted for building permit issuance shall include the following note: Any person exercising a development permit or building permit who, at any time in the preparation for or process of excavating or otherwise disturbing earth, discovers any human remains of any age or any artifact or any other object which reasonably appears to be evidence of an archaeological/cultural resource or paleontological resource, shall:</i></p> <p><i>a. Immediately cease all further excavation, disturbance, and work on the project site;</i></p> <p><i>b. Cause staking to be placed completely around the area of discovery by visible stakes not more than ten feet apart forming a circle having a radius of not less than one hundred feet from the point of discovery; provided, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking;</i></p> <p><i>c. Notify the Santa Cruz County sheriff-coroner and the city of Santa Cruz planning director of the discovery unless no human remains have been discovered, in which case the property owner shall notify only the planning director;</i></p> <p><i>d. Grant permission to all duly authorized representatives of the sheriff-coroner and the planning director to enter onto the property and to take all actions consistent with this section.</i></p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1953, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><i>The project is required to mitigate indoor noise levels to no greater than DNL 45 dBA. The project shall implement the noise study recommendations. Salter recommended STC rated doors and windows with glass and full frames to have STC ratings of 28 to 34 depending on locations, with the exception of the northwest corner of upper floors which require STC 37 and mechanical ventilation in any areas unable to achieve DNL 45 without windows closed.</i></p>
<p>Hazards and Nuisances Including Site Safety and Noise</p>	<p><i>- The City shall require the Applicant to incorporate the following construction noise best management practices into all applicable project bid, design, and engineering documents:</i></p> <p><i>1) Construction work hours shall be limited to the hours of 7 AM to 10 PM.</i></p> <p><i>2) The sign shall also provide a contact name and phone number for the job site and the project's representative for addressing noise concerns.</i></p>

	<p>3) <i>Heavy equipment engines shall be covered and exhaust pipes shall include a muffler in good working condition.</i></p> <p>4) <i>Stationary equipment such as compressors, generators, and welder machines shall be located as far away from surrounding residential land uses as possible. The project shall connect to existing electrical service at the site to avoid the use of stationary, diesel- or other alternatively-fueled power generators, if feasible.</i></p> <p>5) <i>Impact tools such as jack hammers shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. When use of pneumatic tools is unavoidable, it shall be ensured the tool will not exceed a decibel limit of 85 dBA at a distance of 50 feet. Pneumatic tools shall also include a noise suppression device on the compressed air exhaust.</i></p> <p>6) <i>No radios or other amplified sound devices shall be audible beyond the property line of the construction site.</i></p> <p>7) <i>Prior to the start of any construction activity, the Applicant or its contractor shall prepare a Construction Noise Complaint Plan that identifies the name and/or title and contact information (including phone number and email) of the Contractor and District-representatives responsible for addressing construction-noise related issues and details how the District and its construction contractor will receive, respond, and resolve to construction noise complaints. At a minimum, upon receipt of a noise complaint, the Applicant and/or Contractor representative identified in the Plan shall identify the noise source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint.</i></p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p><i>- An Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan prepared by a registered engineer or qualified stormwater pollution prevention plan developer will be required by the City to be submitted as an integral part of the grading plan. Additionally, all grading activities and placement of fill will be completed in accordance with the City's Grading, Erosion, and Sediment Control Regulations.</i></p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p><i>- The project is required to comply with all applicable City regulations and planning division conditions including those of the Regional and State water quality control boards.</i></p> <p><i>- The project is required to comply with Santa Cruz Municipal Code – Chapter 16.19: Storm Water and</i></p>

	<p><i>Urban Runoff Pollution Control – Chapter 16.19, including the implementation of Best Management Practices contained in Section 16.19.140, and Chapters 4 and 6B of the Best Management Practices Manual for the City’s Storm Water Management Program.</i></p> <p>Section 16.19.140 Best Management Practices for Construction Activity</p> <p><i>- Any construction project, including those undertaken under any permit or approval granted pursuant to Titles 15, 18, and 24 of this code, shall implement best management practices (BMPs) including the city’s mandatory BMPs as detailed in the latest BMP manual published by the city’s public works department. BMPs shall be maintained in full force and effect during the duration of the project.</i></p>
<p>Vegetation, Wildlife</p>	<p>Tree Protection</p> <p><i>Protective fencing is required to be provided during the construction period to protect trees to be preserved. This fencing must protect a sufficient portion of the root zone to be effective. Fencing is recommended to be located 8 to 10 X the diameter at breast height (DBH) in all directions from the tree. DBH for each tree is shown in the attached data table. The minimum recommendation for tree protection fencing location is 6 X the DBH, where a larger distance is not possible. There are areas where we will amend this distance based upon tree condition and proposed construction. In my experience, the protective fencing must:</i></p> <ul style="list-style-type: none"> <i>a. Consist of chain link fencing and having a minimum height of 6 feet.</i> <i>b. Be mounted on steel posts driven approximately 2 feet into the soil.</i> <i>c. Fencing posts must be located a maximum of 10 feet on center.</i> <i>d. Protective fencing must be installed prior to the arrival of materials, vehicles, or equipment.</i> <i>e. Protective fencing must not be moved, even temporarily, and must remain in place until all construction is completed, unless approved by a certified arborist.</i> <i>f. Tree Protection Signage shall be mounted to all individual tree protection fences.</i> <p>Bird-Safe Design</p>

	<p><i>The plans submitted for building permit issuance shall identify the use of bird-safe, ultraviolet, and/or patterned glass, or other material or method proven to discourage bird strikes, at the windows and balcony railings on the east wall of the building up to 40-feet in height, with the exception of ground floor glass. Mirrored and/or reflective glass is not permitted anywhere on the building. Uplighting and spotlights are not permitted within any of the landscaped areas.</i></p>

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: _____

Certifying Officer Signature: _____ **Date:** _____

Name/Title: _____

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).