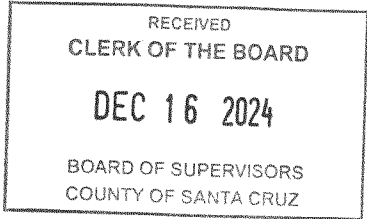


037-24 M

City of Santa Cruz
ENVIRONMENTAL CHECKLIST FORM / INITIAL STUDY

I. Background



1. **Application No:** CP24-0104
2. **Project Title:** Santa Cruz City Schools (SCCS) Educator Housing
3. **Lead Agency Name and Address:**
City of Santa Cruz Planning and Community Development Department
809 Center Street, Room 101
Santa Cruz, CA 95060
4. **Contact Person and Phone Number:**
Timothy Maier, Senior Planner
City of Santa Cruz Planning and Community Development Department
(831) 420-5129 | tmaier@santacruzca.gov
5. **Project Location:** 313 Swift Street (APN 003-16-132) in the City of Santa Cruz; see Figure 1.
6. **Project Applicant's/Sponsor's Name and Address:** THIS NOTICE HAS BEEN POSTED AT THE CLERK OF THE BOARD OF SUPERVISORS OFFICE FOR A PERIOD COMMENCING 12/16 2024 AND ENDING 1/24 2025
Trevor Miller
Santa Cruz City Schools
133 Mission Street, Suite 100
Santa Cruz, CA 95060
7. **General Plan Designation:** Community Facilities
8. **Zoning:** PF (Public Facilities) / CZ-O Coastal Zone Overlay)
9. **Description of the Project:** The proposed project consists of a Planned Development Permit, Coastal Permit, Design Permit, and Heritage Tree Removal Permit for demolition of select existing features and proposed construction of a new, four-story, approximately 120,604 square-foot multifamily educator workforce housing project, encompassing approximately 100 residential units, approximately 119 parking spaces, new landscaping, and associated site modifications, including the removal of five heritage trees.

Residential Building. The proposed residential apartment building would span three distinct wings connected by exterior bridges. The 100 units include 11 studio, 28 one-bedroom, 50 two-bedroom, and 11 three-bedroom apartment units, resulting in a dwelling unit density of 24 dwelling units per acre (du/acre). These units would be reserved for SCCS employees, and the new building and property would be wholly owned by SCCS. The project site plan is shown on Figure 2.

The new buildings would be located behind two existing buildings on the site that front Swift Street. The existing onsite buildings will be retained and include a one-story, 2,077 square-foot administrative building and a one-story, 3,308 square-foot educational building, which will be used for property management offices and resident storage space, respectively. Two existing one-story portable, modular classroom buildings would be removed.

Project entitlements include, among others, a Planned Development Permit to allow for consideration, at the subject site, of a land use not enumerated in the General Plan for the Community Facilities (CF) land use designation nor specified in the Municipal Code as a land use within the list of uses identified as principally or conditionally permitted in the Municipal Code for the P-F zone district. The General Plan CF land use designation envisions sites for existing and potential community facilities, including schools, government offices, community buildings such as the Civic Auditorium, sewer and water facilities, and the City landfill, but does not specifically identify residential uses. The City's 2023-2031 Housing Element, however, does support employee housing (Policy 3.7) and references state legislation to help school districts create housing for employees. Objective 3.7b. supports efforts of the Santa Cruz City School District to provide workforce housing for its employees. City of Santa Cruz Municipal Code Section 24.08.720 states, "A planned development permit provides variation on district regulation, where appropriate", for, among other items, "uses." The project's application for Planned Development Permit therefore provides a mechanism for consideration of the proposed project on a site with a General Plan land use designation of CF and with a Zoning classification of P-F.

It is also noted that the applicant has requested, through CP24-0120, development pursuant to State Senate Bill 330 (Housing Crisis Act) for vesting of the application to local regulations in place at the time of SB330 Preapplication completeness and to accommodate a residential density consistent with the General Plan Land Use designation of CF (Community Facilities), in which development intensity is limited to a Floor Area Ratio (FAR) of 2.5. Affordable housing will be provided through a request for Alternative Compliance pursuant to City of Santa Cruz Municipal Code Section 24.16.030(10), with residential lease rates expected to be approximately 50- to 60-percent of market rate. The project will be funded through two local bond measures.

Existing Structures and Proposed Demolition. The eastern portion of the site is currently occupied by two existing single-story office buildings and two portable, modular classroom buildings. As indicated above, one office building would be converted to storage use and the other would house residential support spaces such as property management offices. The trailers would be removed from the project site. Storage containers, concrete pads, and interior fencing located along the western portion of the project site also would be removed. All existing surface parking, which is located along the northeastern and central portions of the project site, would be removed. The existing sidewalk along Swift Street would be replaced with a new, eight-foot-wide sidewalk.

Access and Parking. The project would provide two vehicular access points, including one from Swift Street to the east and one from Delaware Avenue, through an adjacent property to the north. Entry to the project site would be controlled through automatic sliding vehicular

gates. Each entry point would accommodate inbound and outbound vehicles. A private access easement would cover the northern entry point to allow access through the adjacent property. Turnaround areas for emergency vehicles are proposed at the northwestern and southeastern portions of the project site.

Resident parking would be located behind a resident-only gate, with the remainder of proposed vehicular parking intended to be used by guests and employees occupying the administrative offices. The project proposes 40 standard, 58 compact, 15 Electric Vehicle Supply Equipment (EVSE), 3 ADA-Standard, and 3 ADA-van spaces for a total of 119 spaces. The project would provide 129 bicycle parking spaces as well as 2 bicycle "fix-it" stations.

A new pedestrian path would be built connecting Swift Street to/from Sergeant Derby Park, which borders the project site to the west, through the southern portion of the project site. New pedestrian paths would also be built throughout the project site connecting the building wings to outdoor gathering spaces, parking areas, and administrative buildings.

Landscaping. The project would include 1,800 square feet of private open space and 51,200 square feet of common open space. The proposed project includes removal of 12 trees, five of which are considered heritage trees as defined by the City's Heritage Tree Ordinance, and 10 existing trees on the project site would be retained. Project landscaping would be designed to include shared outdoor gathering spaces for residents. It would include features such as boulders, logs, and stumps as well as natural materials such as wood and decomposed granite. The project would be landscaped with a total of 122 new trees and 65,000 square feet of new planting and groundcover. The project would be subject to provisions of the City's Water Efficient Landscape Ordinance (WELO), per Chapter 16.16 of the City's Municipal Code.

Stormwater and Utilities. The project site is currently partially developed with impervious surface area associated with the office buildings and surface parking. Stormwater would be controlled through a new, 6,300-square-foot bioretention planting area and associated storm drains along the northern border of the project site and along the proposed pedestrian pathway to Sergeant Derby Park. These drainage areas would flow to a Swift Street public storm drain inlet. Furthermore, several Low Impact Development (LID) methods are proposed in the project's Stormwater Control Plan.

The project would be serviced by public sewer and water mains from Swift Street. Electricity would be provided by Pacific Gas & Electric (PG&E).

Construction Schedule and Earthwork. Construction would be expected to occur over approximately two years. During grading and earthwork activities, approximately 1,000 cubic yards (cy) of earth material would be cut and approximately 6,000 cy of earth material would be filled. Therefore, there would be a net volume of 5,000 cy of earth material imported to the project site.

10. Other public agencies whose approval is required: None known.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? Yes

II. Environmental Setting and Surrounding Land Uses

The 4.08-acre project site is located on the west side of Swift Street in the southwestern portion of the City of Santa Cruz in the Lower Westside neighborhood of the City as defined in the City's General Plan (SOURCE V1.a). The site is located south of Delaware Avenue and is bordered by commercial and industrial uses to the north, Swift Street and single-family residential uses to the east, Natural Bridges Children's Center and Gateway School to the south, and industrial and commercial uses, as well as Sergeant Derby Park including tennis courts, to the west. The project site is located within the Coastal Zone, approximately one-third mile north of the Pacific Ocean.

The project site is approximately 52 feet above mean sea level (amsl) and generally slopes toward the south-southeast. The majority of the property is developed with two existing buildings, two portable, modular classroom buildings, surface parking, and an uncovered storage yard. The area of proposed development is located behind the existing buildings and includes paved areas and formerly landscaped, grass areas. A 2,077 square-foot, one-story administrative building currently is used by the Santa Cruz Education Foundation, and a 3,308 square-foot, one-story educational building is used by the Westside Parent Education Nursery School. The modular classroom buildings are used by the Santa Cruz Office of Education Transition program.

FIGURE 1: Vicinity Location



SOURCE: EHDD Architecture

III. Environmental Checklist

Environmental Factors Potentially Affected by the Project: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

✓	Aesthetics		Agricultural and Forestry Resources	✓	Air Quality
✓	Biological Resources		Cultural Resources		Energy
✓	Geology / Soils	✓	Greenhouse Gas Emissions	✓	Hazards and Hazardous Materials
✓	Hydrology / Water Quality		Land Use / Planning		Mineral Resources
✓	Noise		Population / Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
✓	Utilities / Service Systems		Wildfire		Mandatory Findings of Significance

A. Instructions to Environmental Checklist

1. A brief explanation is required (see Section VI, Explanation of Environmental Checklist Responses) for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question (see Section V, References and Data Source List, attached). A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that any effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level.

5. Earlier Analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case a discussion should identify the following on attached sheets:
 - a) *Earlier Analysis used.* Identify earlier analyses and state where they are available for review.
 - b) *Impacts adequately addressed.* Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) *Mitigation measures.* For effects that are “Less than Significant with Mitigation Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

B. Use of Earlier Analyses

In analyzing the proposed project, the City may consider whether existing environmental documents already provide an adequate analysis of potential environmental impacts. An earlier analysis may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) provisions, if it can be determined that one or more effects have been adequately analyzed in an earlier EIR or negative declaration (State CEQA Guidelines Section 15063(c)(3)(D)).

The preparation of this Initial Study has drawn from analyses contained in the *City of Santa Cruz General Plan 2030 EIR* (April 2012), which includes the Draft EIR volume (September 2011) and the Final EIR volume (April 2012). The Santa Cruz City Council certified the EIR and adopted the *General Plan 2030* on June 26, 2012. The General Plan EIR is a “program” EIR prepared pursuant to State CEQA Guidelines section 15168, which reviewed environmental impacts associated with future development and buildout within the City’s planning area that would be accommodated by the General Plan. A program EIR can be used for subsequent projects implemented within the scope of the program/plan and where the project is consistent with the general plan and zoning of the city or county in which the project is located. Typically, site-specific impacts or new impacts that were not addressed in the program EIR would be evaluated in an Initial Study, leading to preparation of a Negative Declaration, Mitigated Negative Declaration or EIR. Site-specific mitigation measures included in the General Plan EIR also would be a part of future development projects, and

supplemented, as may be necessary, with site-specific mitigation measures identified in the subsequent environmental review process. The General Plan EIR reviewed all of the topics included on the Appendix G environmental checklist in the State CEQA Guidelines. In accordance with CEQA and the State CEQA Guidelines, this Initial Study is being “tiered” from the General Plan 2030 EIR. “Tiering” refers to using analyses of general matters contained in an EIR for a plan with later environmental analyses for development projects, concentrating solely on the issues specific to the later project. This approach is in accordance with State CEQA Guidelines section 15152, which encourages lead agencies to use an EIR prepared for a general plan or other program or ordinance, when the later project is pursuant to or consistent with the program or plan. The Initial Study tiers from the General Plan 2030 EIR for the following topics; relevant information is summarized under each subsection.

- Aesthetics – Light and Glare
- Geology and Soils
- Hydrology and Water Quality – Groundwater
- Noise

The General Plan 2030 EIR is on file at the City’s Planning and Community Development Department, 809 Center Street, Room 101, Santa Cruz, California and available for review from 7:30 to 11:30 AM, Monday through Thursday. The document also is available for review on the City of Santa Cruz Planning Department’s website at: <https://www.cityofsantacruz.com/government/city-departments/planning-and-community-development/long-range-policy-planning/general-plan>.

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement Methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (V.1b-DEIR volume)				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				✓
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?				✓
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✓
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			✓	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			✓	
c) Disturb any human remains, including those interred outside of formal cemeteries?			✓	
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✓
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?			✓	
b) Result in substantial soil erosion or the loss of topsoil?			✓	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				✓
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ miles of an existing or proposed school?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		✓		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) Result in substantial erosion or siltation on- or off-site; ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			✓ ✓	

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?			✓	✓
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓
11. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✓
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✓
13. NOISE: Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?			✓	
b) Result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			✓	

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓
15. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?			✓	
b) Police protection?			✓	
c) Schools?			✓	
d) Parks?			✓	
e) Other public facilities?			✓	
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				✓
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			✓	
c) Substantially increase hazards due to a design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				✓
d) Result in inadequate emergency access?				✓
18. TRIBAL CULTURAL RESOURCES. Would the project:				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				✓
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or which could cause significant environmental effects?		✓		
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				✓
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response land or emergency evacuation?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓

ENVIRONMENTAL IMPACTS Issues (and Supporting Information Sources)	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓
21. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			✓	
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects.)			✓	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✓

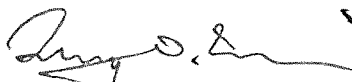
Discussion of Environmental Checklist

See Section VI, Explanation of Environmental Checklist Responses, for discussion.

IV. Determination

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	✓
I find that the proposed project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	



 Timothy Maier, Senior Planner

12/10/24

 Date

V. References and Data Source List

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 - b. 2022. California Air Resources Board 2022 Scoping Plan—Appendix D, Local Actions. November 2022. Available online at: <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-d-local-actions.pdf>.
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Initial Study Preparation: City of Santa Cruz Planning and Community Development Department in association with Dudek.

VI. Explanation of Environmental Checklist Responses

1. Aesthetics

(a) Scenic Views. The project site is located in the southwestern portion of the City in an area characterized by a mix of residential, commercial, light industrial uses, park, and public facility uses. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is not located within any mapped panoramic view areas or in proximity to visual landmarks (SOURCE V.1b-DEIR Figure 4.3 1). The nearest panoramic view is located along West Cliff Drive, approximately 0.3 miles south of the project site. However, the project site is not visible from the coast. A panoramic view near Arroyo Seco, approximately 0.70-mile north of the project site, is identified in the General Plan 2030 EIR. However, the project site is screened from view of this panoramic view area due to existing topography and vegetation, as well as intervening development, elevation changes and distance. In addition, the project is not within an area visible from a mapped viewpoint/panorama as identified in in the City's Local Coastal Program (LCP) maps (SOURCE V.1b-DEIR Map CD-3: Scenic Views); mapped scenic viewpoints from West Cliff Drive are oriented toward the ocean. Thus, the proposed residential development and associated improvements would not be within or have an adverse effect on a scenic view. Therefore, the project would have *no impact* on scenic views.

(b) Scenic Resources. There are no designated state scenic highways or roads within the City. The project site is not located near a state scenic highway. Therefore, *no impact* to scenic resources within a state scenic highway would occur. To accommodate development of the proposed project, 12 trees would be removed, 5 of which are considered heritage trees, as defined by City regulations. Although some of these trees are larger and are visible from adjacent properties and partially visible from Swift Street, the trees are not visible from a wide-ranging, publicly-viewed area, are not visually prominent or distinctive, and are not considered scenic resources. The project site does not contain other physical features that would be considered scenic resources. Therefore, the project would have *no impact* on scenic resources.

(c) Visual Character. The project site is partially developed with two, one-story public facility buildings; two mobile portable classroom trailers; and surface parking lots.

The General Plan 2030 EIR concluded that most of the future development accommodated by the General Plan would not substantially degrade the visual character of surrounding areas with implementation of General Plan policies and actions to develop design guidelines and review development to protect “distinctive design characteristics” and landmarks of neighborhoods (CD2.1, CD2.3) in combination with continued application of design review as part of Design Permit approvals.

Impact Analysis. The proposed project consists of a new residential apartment building that would span three distinct wings connected by exterior bridges. The massing of each wing is defined by longer side-by-side bars and shed roof-style which is inspired by industrial building typologies and a rectangular volume that is more commonly found on mid-sized residential buildings. The building would be four stories tall with a maximum of height 50 feet. This height would be greater than other buildings in the neighborhood, which are generally between one to three stories in height. However, the proposed heights are consistent with heights permitted in the PF zone and adjacent industrial (IG) zone.

The project will be reviewed through the Design Permit process. Per section 24.08.400 of the Municipal Code, the purpose of the City’s Design Permit review is to “promote the public health, safety and general welfare through the review of architectural and site development proposals and through application of recognized principles of design, planning and aesthetics and qualities typifying the Santa Cruz community.” The City must make the required findings to approve the Design Permit for the project, and with approval, the project would be consistent with Design Permit regulations that serve to reduce potential visual character impacts.

The City of Santa Cruz is an “urbanized area” under the definition of the term in CEQA Guidelines section 15387. Per the CEQA Guidelines Environmental Checklist (Appendix G), the City need not specifically consider existing visual character or the quality of the existing views and the project’s potential effect on them. In an urbanized area, a project that conflicts with applicable zoning and other regulations governing scenic quality could be considered to result in a significant impact regarding scenic quality.

One of the findings set forth in section 24.08.430 of the City's zoning ordinance for approval of a Design Permit is that the site plan shall be situated and designed to protect views along the ocean and of scenic coastal areas. As discussed in Impact AES-1, the proposed project would not result in impacts to existing scenic views and would not affect coastal views along West Cliff Drive. Section 24.08.250 of the City's Municipal Code also requires a finding with approval of a coastal permit that a development will maintain views between the sea and the first public roadway parallel to the sea. The proposed project would not be located between a road and the ocean and would not affect coastal views.

There are no other applicable zoning and other regulations governing scenic quality. The project does not conflict with applicable zoning and other applicable regulations governing scenic quality. Therefore, the project and would have a *less-than-significant* impact on the visual character of public views.

This conclusion also is consistent with CEQA (Public Resources Code section 21099), which provides that aesthetic impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment, although design review would still be required pursuant to local City requirements and regulations. "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned. The project qualifies as a residential project on an infill site in a transit priority area (approximately 2,000 feet south of Mission Street); see also discussion in section VI.17(b).

(d) Light and Glare. Light and glare refers to exterior lighting associated with surface parking, walkways, and lighting on buildings. There are no existing significant sources of excessive light or glare in the project area.

Impact Analysis. The project would not result in introduction of a major new source of light or glare. Although there would be exterior lighting on the proposed multi-family building, this would be typical of residential areas. This would not be expected to create significant visual impacts on the surrounding area as lighting would not be directed to off-site adjacent properties. Additionally, section 24.14.266 of the City's Municipal Code prohibits direct or sky-reflected glare. Exterior building lighting also would be further reviewed as part of the Design Permit review process, and the project would be conditioned to install lighting such that it is directed downward and does not create light spillover onto adjacent properties.

The General Plan 2030 EIR concluded that new infill development accommodated by the plan could result in potential sources of light and glare but would not result in creation of "substantial" new sources of light and glare or result in a significant impact. The EIR indicated that infill buildings would have standard window and exterior lighting treatments but would not be expected to result in new sources of substantial light or glare as future development projects would largely replace or redevelop existing urban uses. (The General Plan 2030 EIR analyses are included on pages 4.3-19 to 4.3-20 of the Draft EIR volume.)

Thus, the project would not be expected to create a new substantial source of light and glare and would not impact adjacent properties and the surrounding area. The following standard condition of approval will be included in the Project Conditions of Approval. Therefore, the project would result in a *less-than-significant impact* related to creation of a new source of substantial light or glare.

STANDARD CONDITION OF APPROVAL: Plans submitted for building permit issuance shall show all exterior site lighting locations and fixture details. All exterior building lighting shall be shielded and contained in a downward direction. No exterior lighting shall produce off-site glare.

2. Agriculture and Forestry Resources

The project site does not contain farmland or grazing land as mapped on the Santa Cruz Important Farmland Map by the California Department of Conservation Farmland Mapping and Monitoring Program (SOURCE V.1b-DEIR Figure 4.15-1). The project site is designated as “Urban and Built-Up Land.” Surrounding lands are designated as “Other Land” and “Urban and Built-Up Land.” Neither the site nor adjacent lands are designated for agricultural uses in the City’s General Plan. The project site is not zoned Timberland Production. Therefore, the project would not result in the conversion of agricultural or forest lands to other uses, and *no impact* would occur.

3. Air Quality

(a) Conflict with Air Quality Management Plan. In 1991, the Monterey Bay Air Resources District (MBARD) adopted the Air Quality Management Plan (AQMP) for the Monterey Bay Region in response to the California Clean Air Act of 1988, which established specific planning requirements to meet the ozone standards. The California Clean Air Act requires that AQMPs be updated every three years. The MBARD has updated the AQMP seven times. The most recent update, the *2012-2015 Air Quality Management Plan (2016 AQMP)*, was adopted in 2017. The 2016 AQMP relies on a multilevel partnership of federal, state, regional, and local governmental agencies. The 2016 AQMP documents the MBARD’s progress toward attaining the state 8-hour ozone standard, which is more stringent than the state 1-hour ozone standard. The 2016 AQMP builds on information developed in past AQMPs and updates the 2012 AQMP. The primary elements from the 2012 AQMP that were updated in the 2016 revision include the air quality trends analysis, emission inventory, and mobile source programs (SOURCE V.6a).

For population-related projects, the MBARD developed a procedure that compares existing, under-construction, and approved residential dwelling units with AMBAG’s housing unit forecast for a jurisdiction, as dwelling units are closely related to population and can be tracked within local jurisdictions; therefore, the number of dwelling units is used as the method for determining consistency with the AQMP. Consistency of indirect emissions associated with commercial, industrial, or institutional projects intended to meet the needs of the population as forecast in the AQMP is determined by comparing the estimated current population of the county in which the project is to be located with the applicable population forecast in the AQMP. If the estimated current population does not exceed the forecasts, indirect emissions

associated with the project are deemed to be consistent with the AQMP. Projects which are consistent with AMBAG's regional forecasts have been accommodated in the AQMP and are therefore consistent with the AQMP (SOURCE V.6a and 6c). The MBARD's most recent 2015 AQMP utilized AMBAG's 2014 Regional Growth Forecast.

The City had 24,506 existing dwelling units as of January 1, 2024 (California Department of Finance, 2024), and approximately 2,100 residential units are under construction or have been approved throughout the City, including residential development at the University of California Santa Cruz (UCSC)¹. With the addition of these units, the City's housing units would total approximately 26,610 dwelling units. The City's total number of housing units would increase to 27,710 dwelling units with the addition of the project's 100 residential apartment units. The resulting total is below the AMBAG Regional Growth Forecast of 28,297 dwelling units for the year 2030 that were factored into the AQMP. Therefore, the proposed project would be consistent with the AQMP, would not conflict with or obstruct implementation of the AQMP and would result in *no impact*.

(b) Project Criteria Pollutant Emissions. The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards that are the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety to protect public health and welfare. Criteria pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), inhalable particulates (PM₁₀), fine particulates (PM_{2.5}), and lead. High O₃ levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x), which react under certain meteorological conditions to form O₃. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants. An area is designated as "in attainment" when it is in compliance with the federal and/or state standards, as further discussed below.

The project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the MBARD and includes Santa Cruz, Monterey, and San Benito Counties. The NCCAB is designated attainment for the federal PM₁₀ and SO₂ standards, and is designated attainment/unclassified for the other federal standards. The NCCAB is designated attainment for the state PM_{2.5}, NO₂, SO₂, and lead standards, and is designated unclassified for CO in Santa Cruz County. The NCCAB has nonattainment designations for state O₃ and PM₁₀ standards.

The MBARD 2012-2015 AQMP, adopted March 15, 2017, identifies a continued trend of declining O₃ emissions in the NCCAB primarily related to lower vehicle miles traveled (VMT),

¹ Residential projects at UCSC are primarily student housing projects, and there is one approved employee housing project and the first phase of the Student Housing West (Hagar Development). In general, part-year student housing is considered group quarters and year-round faculty / student family housing is counted as housing units (SOURCE V.3a). For the 2014 forecast used in the AQMP, University population and housing projections were completed separately from jurisdiction population projections (SOURCE V.3c). For the purpose of this review and in accordance with current AMBAG guidance, approved employee housing is considered as housing units, and student housing is considered group quarters and is not included as housing units, but the population accommodated by new student housing is included in the population estimates.

showing that the region is continuing to make progress toward meeting the state O₃ standard during the three-year period reviewed (SOURCE V.6a).

The General Plan 2030 EIR concluded that future development accommodated by the Plan could result in air pollutant emissions, but overall future emissions of ozone precursor pollutants are projected to decrease or remain nearly unchanged over the next 20 years, and thus, project-level emissions would not contribute to existing or potential future violations of air quality standards related to O₃. The General Plan EIR further concluded that, while PM₁₀ emissions would increase, compliance with MBARD significance criteria at a project level would ensure that emissions would not exceed daily standards. It was also found that vehicular emission rates are anticipated to lessen in future years due to continuing improvements in automobile and fuel efficiency and new regulations and programs adopted by the State of California that are scheduled to be phased in over the life of the proposed General Plan, and such reductions are factored into the air quality models used to estimate emissions.

Furthermore, the General Plan 2030 includes goals, policies and actions that set forth measures to avoid and minimize adverse impacts on air quality, including environmental review to address project-level emissions, requiring project-level mitigation measures, and reduction of vehicle trips and emissions. General Plan policies and actions LU1.2, LU1.2.1 and HZ2.2.1 (as modified by the General Plan EIR) are intended to ensure that new development does not result in creation of air pollution and implements measures set forth by the MBARD as part of future project-level review. Specifically, Action HZ2.2.1 requires future development projects to implement applicable MBARD control measures and/ or air quality mitigation in the design of new projects as set forth in the District's "CEQA Guidelines." General Plan Action HZ2.2.2 permits major indirect sources of air pollution only if transportation measures are provided to reduce impacts to a less-than-significant level, consistent with applicable MBARD-recommended mitigation and control measures as set forth in the District's CEQA Guidelines. The policies and actions require future project-level review and implementation of mitigation measures, if warranted, consistent with the adopted standards in the MBARD's CEQA Guidelines. The General Plan EIR concluded that with implementation of the General Plan policies and actions, compliance with MBARD requirements and air quality control measures, and adherence to MBARD permit requirements, contributions to air pollutant emissions and air quality impacts would be less than significant.

Impact Analysis. The proposed project would result in construction of a 100-unit residential apartment project. The project would indirectly generate air pollutant emissions through new regional vehicle trips. The MBARD CEQA Guidelines provide several land use types with corresponding screening threshold levels to assess ozone impacts. The proposed project size is substantially below the MBARD's screening levels for apartments (1,080 dwelling units), which is used to determine potential significant ozone impacts as set forth in the MBARD's CEQA Air Quality Guidelines (SOURCE V.6c). Therefore, project emissions typically would not be considered substantial or result in an air quality violation, although air emissions as a result of the project were modeled as further described below.

Project construction could result in generation of dust and PM₁₀ emissions as a result of site excavation and grading. According to MBARD's CEQA Air Quality Guidelines (SOURCE

v.6c), construction activity on 8.1 acres per day with minimal earthmoving or 2.2 acres per day with grading and excavation are assumed to be below the MBARD's PM10 significance threshold of 82 pounds per day. The area of proposed development is approximately 4.08 acres in size.

Because the project site exceeds 2.2 acres, air emissions were modeled for project construction and operations using the California Emissions Estimator Model (CalEEMod) Version. The results are summarized in Tables 1 and 2, and as shown, neither project construction nor operational emissions would exceed MBARD thresholds for criteria pollutant air emissions. Therefore, the project-level review required by the *General Plan 2030*, finds that potential emissions would not exceed MBARD's adopted CEQA significance thresholds, and the project would not violate current air quality standards.

Table 1. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Year	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds per day					
Summer						
2026	6.68	51.67	47.79	0.12	4.52	2.28
2027	0.39	1.08	4.08	<0.01	0.58	0.15
2028	--	--	--	--	--	--
Winter						
2026	1.28	11.41	11.89	0.03	2.31	1.18
2027	11.48	7.00	15.26	0.01	1.44	0.50
2028	11.39	6.96	14.84	0.02	1.41	0.47
Maximum Daily Emissions	11.48	51.67	47.79	0.12	4.52	2.28
<i>MBARD Threshold</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>82</i>	<i>N/A</i>
Threshold Exceeded?	N/A	N/A	N/A	N/A	No	N/A

Source: Dudek

Notes: CO = carbon monoxide; MBARD = Monterey Bay Air Resources District; N/A = not applicable; NO_x = oxides of nitrogen; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; ROG = reactive organic gases; SO_x = sulfur oxides. The values shown are the maximum summer or winter daily emissions results from CalEEMod and include watering of exposed areas two times per day, per the City's Standard Construction Practices. Construction would not occur during Summer of 2028.

Technical calculations are on file with the City of Santa Cruz Planning and Community Development Department.

Table 2. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>pounds per day</i>					
Summer						
Mobile	2.59	1.43	13.82	0.02	2.24	0.58
Area	3.34	0.05	5.68	<0.01	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total Summer Emissions	5.93	1.49	19.50	0.02	2.24	0.58
Winter						
Mobile	2.57	1.67	14.99	0.02	2.24	0.58
Area	2.84	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Total Winter Emissions	5.41	1.67	14.99	0.02	2.24	0.58
Maximum Daily Emissions	5.93	1.67	19.50	0.02	2.24	0.58
<i>MBARD Threshold</i>	<i>137</i>	<i>137</i>	<i>550</i>	<i>150</i>	<i>82</i>	<i>N/A</i>
Threshold Exceeded?	No	No	No	No	No	N/A

Source: Dudek

Notes: CO = carbon monoxide; MBARD = Monterey Bay Air Resources District; N/A = not applicable; NO_x = oxides of nitrogen; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; ROG = reactive organic gases; SO_x = sulfur oxides. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Technical calculations are on file with the City of Santa Cruz Planning and Community Development Department.

*Includes all-electric development

General Plan Action HZ2.2.1 establishes a procedure for project-level reviews and requires site-specific mitigation measures if significant impacts are identified. These measures include applicable MBARD control measure and/ or air quality mitigation. The proposed project has complied with this requirement; no significant impacts were identified. Thus, impacts of criteria air pollutant from construction and operation of the project would be *less than significant*.

In addition, according to the MBARD *CEQA Air Quality Guidelines*, projects that are consistent with the AQMP would not result in cumulative impacts as regional emissions have been factored into the AQMP. The MBARD prepares air quality plans which address attainment of the state and federal emission standards and incorporate growth forecasts developed by AMBAG. As indicated in subsection 3(a) above, the proposed project would not conflict with, or obstruct the implementation of, the AQMP, which takes into account cumulative development within the City. Therefore, the proposed project would not result in a cumulatively considerable criteria pollutant increase.

(c) Sensitive Receptors. For CEQA purposes, a sensitive receptor is defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade 12 schools; daycare centers; and healthcare facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing (SOURCE V.6c). The project site is located within a developed -residential neighborhood, and existing

residences, which are considered sensitive receptors, are located to the east and west of the project site. The Gateway School and Natural Bridges Children's Center to the south of the project site are also considered sensitive receptors. The proposed residential project would not introduce a new source of stationary emissions, and thus, would not expose sensitive receptors to substantial pollutant concentrations.

Diesel Particulate Emissions. Diesel particulate matter was identified as a toxic air contaminant (TAC) by the State of California in 1998. The General Plan 2030 EIR discusses construction-related impacts in which diesel particulate matter could be emitted from construction equipment. The impact was found to be less than significant due to the California Air Resources Board's ongoing adoption of regulations for in-use, off-road diesel vehicles that would significantly reduce particulate matter emissions by requiring fleet owners to accelerate turnover to cleaner engines and install exhaust retrofits. The EIR also noted that the California Code of Regulations, Title 13, section 2486(c)(1) prohibits idling of a diesel engine for more than five minutes in any location, thereby further limiting particulate matter emissions. Additionally, emissions during construction are of a short-term duration in comparison to life-long exposure and health risks. Construction-related diesel emissions at the project site would be of limited duration (i.e., primarily during grading) and temporary. Thus, the construction of the proposed residential apartment project would not expose sensitive receptors to diesel emissions.

Subsequent to certification of the General Plan 2030 EIR, changes were made to California guidelines regarding review of health risks associated with exposure to TACs. The most recent guidance from the Office of Environmental Health Hazard Assessment (2015 Risk Assessment Guidelines Manual²) updated some cancer risk parameters, such as age-sensitivity factors, daily breathing rates, exposure period, fraction of time at home, and cancer potency factors. Diesel particulate emissions from heavy construction equipment and vehicles during construction could result in a health risk to proximate sensitive receptors, particularly to children and pregnant women. However, use of heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions and use of diesel trucks is also subject to an Airborne Toxics Control Measure, which serve to reduce emissions. Additionally, construction equipment that includes CARB-compliant emissions control equipment or diesel particulate filters can substantially reduce emissions and associated potential health risks to a level that would not be considered a significant impact.

General Plan 2030 Policy and Program HZ2.2 and HZ2.2.1 require review of air quality issues and mitigation of air quality impacts, and use of best available equipment controls are standard measures to control or reduce diesel emissions. The City's Climate Action Plan (CAP) (SOURCE 2.a) includes measures to work toward reduction/elimination of off-road gasoline- and diesel-powered equipment, including construction equipment (Actions T6.1 through T6.5), and best available equipment technology is identified as typical controls for TAC emissions from diesel equipment (SOURCE 2a-Appendix A). Additionally, the City's Water Department has identified Standard Construction Practices to be implemented by the City and/or its contractors during

² Office of Environmental Health Hazard Assessment. February 2015. Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.

construction, which includes a requirement to use specified CARB-compliant equipment and/or diesel-particulate filters to substantially reduce diesel emissions.

A standard project condition of approval requires use of specified CARB-compliant equipment and/or filters (e.g., requiring use of Tier 4 emission control technology), which would mitigate potential impacts associated with exposure to diesel emissions to a less-than-significant level, consistent with General Plan Program HZ2.2.1, Climate Action Plan measures and Standard Construction Practices implemented in the City. The following standard condition of approval will be included in the Project Conditions of Approval. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and potential exposure of sensitive receptors to diesel particulate matter and associated risks would be considered *less than significant*.

STANDARD CONDITION OF APPROVAL: All diesel-fueled off-road construction equipment greater than 75 horsepower shall be zero-emissions or equipped with California Air Resources Board (CARB) Tier 4 Final or Interim compliant engines. Alternatively, CARB Tier 2 or 3 compliant engines may be used if CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) filters are added to each piece of off-road diesel-fueled equipment.

(d) Odors. According to the Air District's *CEQA Air Quality Guidelines* (SOURCE V.6c), land uses associated with odor complaints typically include landfills, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, and refineries. The proposed residential project does not include any uses associated with odors and would not create objectionable odors. Thus, *no impact* would occur.

4. Biological Resources

(a-c) Special-Status Species and Sensitive Habitat. The project site is primarily developed with two single-story buildings, two mobile portable classroom trailers, concrete pads and paved surface parking. The project site also includes areas of non-native grassland and 26 planted trees on or immediately adjacent to the project site. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is not located within, or adjacent to, a sensitive habitat area (SOURCE V.1b-DEIR Figure 4.8-3). No areas of riparian and wetland habitat are located on or adjacent to the project site. The infill project site is surrounded by urban residential, light industrial, commercial, and public facility uses to the north, south, east, and west and recreational park space to the southwest. The project site does not contain sensitive habitat or habitat for special-status species. For these reasons, no special-status plant or wildlife species or sensitive are expected to be present on the project site. Therefore, the project would have *no impact* on special-status species or sensitive habitat.

(d) Wildlife Movement/Breeding. The primary wildlife movement corridors within the City are located along major watercourses and within City-owned open space lands, which would be protected from future development impacts. As noted above, the project is not mapped within or adjacent to sensitive habitat areas and is not adjacent to a watercourse. The site does not contain habitat nor does it connect to other habitat areas. The General Plan 2030 EIR concluded

primary wildlife movement corridors in the City are located along major watercourses and within City-owned open space lands. The proposed project is not located adjacent to, or within proximity to, a watercourse or City-owned open space lands.

The project site is partially developed and located within a developed urban area. The site does not contain habitat, nor does it connect to other habitat areas and is not within or adjacent to a creek, riparian area, or wildlife dispersal area. The project is not located adjacent to or within proximity to a watercourse. Thus, the project would have no effect on wildlife movement and would not interfere with native fish or wildlife movement, and therefore the project would result in *no impact* related to wildlife movement.

Impact Analysis. The project would result in removal of 12 trees on the project site. These trees could provide potential nesting habitat for migratory birds which are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Tree removal during the breeding season (generally February 15 to August 31) has the potential to destroy bird nests, eggs or chicks if any are present during the removal. Compliance with the MBTA would require that either a pre-construction nesting survey be conducted to confirm that no nesting birds protected under the MBTA are present if trees are removed during the nesting season or to remove trees outside of the nesting season. Compliance with required regulations would not result in a significant impact. Furthermore, General Plan Action NCR2.4.1 and Table 1 establish biological survey protocols, including pre-construction nesting bird surveys with establishment of appropriate construction buffers if needed, if tree removal and/or construction were to commence during the nesting season. A standard project condition of approval requires implementation of a pre-construction nesting survey, and the following standard condition of approval will be included in the Project Conditions of Approval. Because the project would be required to comply with the MBTA and General Plan Action NCR2.4.1, and a standard condition of approval will be imposed by the City that requires a pre-construction survey during the construction period with protection of nesting birds if any are found, the potential impact to nesting birds is considered *less than significant*.

STANDARD CONDITION OF APPROVAL: If project site work occurs anytime between February 1 and August 31, the applicant shall submit documentation of a pre-construction nesting bird survey by a qualified biologist prior to the start of work. The survey shall be described in the biotic report, if such a report was prepared, and shall be completed no more than seven days before the start of any project construction activities on the site (including tree removal, clearing, and excavation) and shall include observations of any nesting activities on the site. Site work may commence once the Planning Department has accepted the report and confirmed that there are no nesting birds on the site or that an appropriate buffer zone around any active nests has been recommended by the biologist and physically established on the site.

(e) Conflicts with Local Plans. An arborist review (SOURCE V.10) was conducted to review existing trees on the project site. The project would result in removal of five heritage trees as defined by the City's Heritage Tree Ordinance in Chapter 9.56 of the City's Municipal Code. Generally, trees with a 14-inch or larger diameter are heritage trees.

Chapter 9.56 of the City Municipal Code defines heritage trees, establishes permit requirements for the removal of a heritage tree, and sets forth mitigation requirements as adopted by resolution by the City Council. Resolution NS-23, 710 adopted by the City Council in April 1998 establishes the criteria for permitting removal of a heritage tree and indicates that one or more of the following findings must be made by the Director of Parks and Recreation:

- 1) The heritage tree or heritage shrub has, or is likely to have, an adverse effect upon the structural integrity of a building, utility, or public or private right of way;
- 2) The physical condition or health of the tree or shrub, such as disease or infestation, warrants alteration or removal; or
- 3) A construction project design cannot be altered to accommodate existing heritage trees or heritage shrubs.

Resolution NS-21, 436 sets forth the tree replacement/mitigation requirements for approved removal of a heritage tree to include replanting three, 15-gallon or one, 24-inch-size specimen or payment of the current retail value, which shall be determined by the Director of Parks and Recreation. Removal would be permitted if found in accordance with the above criteria and requirements. Approval of a tree removal permit automatically requires replacement trees as set forth above. Removal of heritage trees consistent with City regulations and requirements is not considered a significant impact.

Removal of 5 heritage trees would require planting of 15, 15-gallon trees or five, 24-inch-size trees to replace the removed heritage trees. Because the project site is located in the coastal zone, LCP Policy CD 6.1.2 requires a two-to-one replacement for tree removal relevant to new construction. Therefore, the project would be required to plant at least 10 new replacement trees.

Approval of a heritage tree removal permit automatically requires replacement trees or payment of an in-lieu fee. Removal of a heritage tree that is consistent with the criteria, provisions, and requirements set forth in City regulations would not result in a conflict with a local ordinance. The project's proposed landscape plan includes a total of 122 new trees that would exceed the replacement tree size requirements established in City regulations and LCP. The project proposes to plant 57 small canopy trees, 39 large canopy trees, 20 parking lot trees, and 6 street trees of various species. The proposed tree replanting would exceed the City's replanting minimum requirements. Therefore, the project would replace removed heritage trees in accordance with City requirements and would result in *a less than significant impact* related to potential conflicts with City regulations protecting trees. The project arborist report includes recommendations for protection of retained trees during construction, which would be included as a project condition of approval.

(f) Habitat Conservation Plans. There are no adopted Habitat Conservation or Natural Community Conservation Plans in the project vicinity. The City's recently approved Operations and Maintenance Habitat Conservation Plan (O&M HCP) is not applicable to the proposed project or project site as it was developed for improvements or projects related to City facilities with the potential to take federally listed species and other non-listed special-status species. Therefore, the project would have *no impact* with regards to Habitat Conservation Plans.

5. Cultural Resources

(a) Historical Resources. The project site is not located within a designated historic district (SOURCE V.1b-DEIR Figure 4.94). The existing buildings on the project site are not listed in the Santa Cruz Historic Building Survey. The existing buildings were developed as part of the Natural Bridges School in 1964. Although the existing buildings are more than 45 years old and could potentially qualify as historical resources under CEQA, the buildings would be retained as part of the project, and no alterations to existing buildings are proposed. Therefore, the project would result in *no impact* to historical resources.

(b-c) Archaeological Resources. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is located within an area that is sensitive for archaeological resources (SOURCE V.1b-DEIR Figure 4.9-1). The site is not located within an area that is sensitive for historic archaeological resources (SOURCE V.1b-DEIR Figure 4.9-3).

Two archaeological investigations of the site were conducted in 2023, which included a records search of the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) at Sonoma State University and field reconnaissance. The records search identified one archaeological resource and two recorded historical resources within a ½-mile radius of the project site (SOURCE V.14). No evidence of surface or subsurface precontact archaeological deposits was observed during the field reconnaissance of the property (SOURCE V.14). The investigation did not recommend subsurface testing as no recorded or potentially significant precontact or historical archaeological resources have been identified within or adjacent to the project parcel (SOURCE V.14). A subsequent cultural resource inventory conducted for the project also indicated that no archaeological resources have been previously identified within the project area or within a 1/4-mile radius of the project site, and visual inspection of the site revealed no evidence of precolonial or historic-era artifacts or archaeological deposits (SOURCE V.9).

Impact Analysis. The project site is located within an area considered to have low potential for archaeological sensitivity or archaeological resources, and construction is unlikely to disturb unknown resources. A project cultural resources assessment did not find evidence of cultural resources and potentially significant precolonial and historic-era archaeological materials are not located in the project area (SOURCE V.9 and V.14). In the event an unknown cultural resource is discovered during soil disturbing construction activities, compliance with local and state regulations would be required. Section 24.12.430 of the City's Municipal Code sets forth the procedure to follow in the event that prehistoric or cultural features are accidentally discovered during construction. Under provisions of this Code section, work shall be halted within 50 meters (150 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, the Planning Director shall be immediately notified, and appropriate mitigation measures shall be formulated and implemented. Additionally, the County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are

determined to be Native American. Therefore, the project would result in a *less-than-significant impact* to archaeological resources.

6. Energy

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas service to the City. Central Coast Community Energy (3CE), formerly Monterey Bay Community Power (MBCP), was formed in March 2017 as a joint powers authority to provide locally controlled, 100% carbon-free electricity to residents and businesses in Monterey, San Benito and Santa Cruz Counties through the Community Choice Energy (CCE) model established by the State of California. The CCE model enables communities to choose clean-source power at a cost equivalent to PG&E while retaining PG&E's role in maintaining power lines and providing customer service. 3CE started supplying electricity to customers in spring 2018 with existing customers automatically enrolled. 3CE supplies electricity generated from hydropower, solar and wind, which are renewable resources.

The state of California's per capita electrical use has been the lowest or one of lowest of any state in the United States. California is among the top states in the nation in net electricity generation from renewable resources. The state leads the nation in net electricity generation from solar, geothermal, and biomass (SOURCE V.8).

In 2007, Santa Cruz became one of the first municipalities in the nation to require new construction to include the adoption of environmentally superior building materials and designs. Builders in Santa Cruz now use best practices for their construction projects that enhance building energy efficiency and water conservation. The City encourages energy conservation strategies, for example, through its green building program, and has seen an increase in solar energy system installations. The City is in the process of expanding an existing building decarbonization and electrification program to improve energy efficiency in existing buildings, to remove natural gas, and to replace the natural gas with energy-efficient electric appliances such as heat pumps (SOURCE V.1d).

(a) Energy Use. Construction of the project would require consumption of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment, and other resources including, but not limited to, lumber, sand, gravel, asphalt, metals, and water. Construction would include energy used by construction equipment and other activities at the project site (e.g., building construction, grading, paving), in addition to the energy used to manufacture the equipment, materials, and supplies and transport them to the project site. It is expected that nonrenewable energy resources would be used efficiently during future construction of residential units accommodated by the project. Therefore, the amount and rate of consumption of such resources during construction and maintenance activities would not result in the unnecessary, inefficient, or wasteful use of energy resources.

The proposed project avoids or reduces inefficient, wasteful, and unnecessary consumption of energy. The project would be subject to approval of building permits that meet the California Building Code and City Green Building Code requirements, as well as compliance with City

requirements for water conservation fixtures and features, including drought-resistant landscaping. The project applicant proposes to construct the project with all electric utilities. Additionally, Santa Cruz residents can enroll in 3CE, which supplies electricity generated from renewable resources. The project also includes 15 EVSE parking spaces that would be available for residents.

Overall, the future consumption of electrical and natural gas resources would not represent unnecessary, inefficient, or wasteful use of resources given the ongoing implementation of the City's Climate Action Plan and General Plan 2030 policies that address lighting and energy conservation measures. In addition, new structures will be required to be constructed in accordance with specifications contained in Title 24 of the California Code of Regulations and the City's Green Building Regulations. Such measures have been factored into California energy forecasts which predict an overall reduction in per capita use of electricity due to energy efficiency standards and conservation. Therefore, the proposed project would not result in wasteful or inefficient energy use during construction or operation and would result in a *less-than-significant impact*.

(b) Conflicts with Plans. Construction and operation of the project would not conflict with or obstruct implementation of a state or local plan for renewable energy. Therefore, the project would result in *no impact*.

7. Geology and Soils

(a.i) Fault Rupture. The project site is located in a seismically active region of California and the region is considered to be subject to very intense shaking during a seismic event. The project site is located in a seismically active region of California and the region is considered to be subject to very intense shaking during a seismic event. The City of Santa Cruz is situated between two major active faults: the San Andreas, approximately 11.2 miles to the northeast and the San Gregorio, approximately 9.9 miles to the southwest. According to the Geotechnical Engineering and Geohazard Investigation report performed for the project, the nearby active San Andreas, San Gregorio and Monterey Bay-Tularcitos (Seaside-Monterey segment) faults are the predominant contributing sources of seismic activity for the project site (SOURCE V.13c).

There are no active fault zones or risk of fault rupture within the City (SOURCE V.1b-DEIR volume). The project site is not located within a State-designated Alquist Priolo Earthquake Fault Zone. The nearest known "active" fault to the project site is the Monterey Bay - Tularcitos Fault Zone, is located approximately 4.75 miles southwest of the project site, and the potential for surface fault rupture at the project site due to a known "active" fault is considered low (SOURCE V.13c). Therefore, the project would result in *no impact* related to fault rupture.

(a.ii-iv). Seismically induced hazards include ground shaking, surface rupture, ground failure, settlement, landslides, and water waves (SOURCE V.1a). As indicated above, the project site is located in a seismically active region of California, which has the potential to be subject to intense shaking during a seismic event. According to maps developed for the City's *General Plan 2030* and included in the General Plan 2030 EIR, the project site is not located in an area susceptible to liquefaction (SOURCE V.1b-DEIR Figure 4.10-4) or within a mapped landslide area

(SOURCE V.1b-DEIR Figure 4.10-3). A geotechnical investigation was prepared for the project site that included soils borings and testing (SOURCE V.13c).

The project site is relatively flat, and according to a review of mapping done for project-specific geotechnical report, the project area is not within the landslide hazard areas or areas with slopes greater than 50 percent. The City's General Plan mapping also shows the site and surrounding area as being located outside any definitive, probable or questionable landslides. Consequently, the potential impacts to the site from active landsliding is considered low (SOURCE V.13c).

Impact Analysis. The proposed structures would be subject to seismic shaking from an earthquake on regional faults, but with implementation the geotechnical investigation recommendations, exposure to seismic hazards would be considered a *less-than-significant impact*.

The City is in relative proximity to historically active faults; as such, there is potential for development to be subject to strong seismic ground shaking. While the potential for seismic ground shaking cannot be eliminated, the project would be required to comply with the 2022 California Building Standards Code (California Code of Regulations, Title 24), which includes requirements for geotechnical investigations that establish seismic design parameters. Compliance with recommendations in the project geotechnical report and with the California Building Standards Code would reduce risks associated with strong seismic ground shaking at the project site. Therefore, the project would have a *less-than-significant impact* with regard to strong seismic ground shaking.

According to the Geotechnical Engineering and Geohazard Investigation report performed for the project, based on geotechnical testing, the project site has a moderate potential for liquefaction and seismic settlement; this is due to the granular nature of many of the project site soils within the upper 10 feet below site grade (BSG) as well as the presence of shallow groundwater (SOURCE V.13c). The findings of the liquefaction analyses indicate that numerous layers of granular soils, with thicknesses ranging from less than a foot to about 3 feet thick within the upper about 10 to 15 feet of soils, are susceptible to liquefaction as a result of potential seismic shaking. The results of the seismic settlement analyses indicated a total seismic settlement of about 3 to 4 inches due to liquefaction. Based on the analysis, the liquefiable soils are within the zone of influence of the proposed building foundations. To address liquefaction, the geotechnical report recommends specialty deep ground improvement methods or deep foundation systems to mitigate potential for failure due to liquefaction.

Other than liquefaction, which can be addressed through geotechnical engineering methods, the geotechnical report did not identify other geologic or seismic hazards that pose significant potential impacts. The project would be designed to accommodate site-specific geologic conditions in accordance with recommendations of the project site-specific geotechnical report, and, as applicable, would adhere to the provisions of the California Building Code (CBC) to address geologic hazards and include appropriate design measures.

The General Plan 2030 EIR concluded that adherence to existing regulations and standards, including the California Building Code (CBC) and various policies and actions established in the *General Plan 2030* would minimize harm to people and structures from adverse seismic hazards. General Plan Action HZ6.3.1 requires that all new construction conform with the latest edition of the CBC, and Municipal Code section 18.040.030 adopts State of California building codes as part of the City's Building Code. General Plan Action HZ6.3.6 requires site-specific geologic investigation(s) by qualified professionals for proposed development in potential liquefaction areas and requires developments to incorporate the design and other mitigation measures recommended by the investigation. In addition, Municipal Code section 24.14.070 requires preparation of a geotechnical report and implementation of recommendations for residential projects with more than four units that are located within potential liquefaction areas, which has been completed for the project. Thus, buildings must be designed in accordance with the latest edition of the CBC, which sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. Conformance to the CBC as required by state law and the City would ensure the maximum practicable protection available for structures and their associated trenches, excavations and foundations. (The General Plan 2030 EIR analyses are included on pages 4.10-21 to 4.10-23 of the Draft EIR volume.)

The General Plan 2030 EIR concluded that with adherence to existing regulations and standards, including preparation of a project-specific geotechnical report and adherence to the CBC, as incorporated into the City's Municipal Code, and various policies and actions established in the General Plan, harm to people and structures from adverse seismic events would be minimized (SOURCE V.1b-DEIR volume).

The project geotechnical report includes recommended design measures to ensure the project would not cause substantial adverse effects, including the risk of loss, injury, or death due to potential existing geologic hazards. Demonstration of project design adherence to geotechnical report recommendations will be required at the time of building permit application that demonstrates that the proposed buildings are designed to current seismic design standards. Compliance with recommendations in the project geotechnical report and with the California Building Standards Code would reduce risks associated with strong seismic ground shaking, liquefaction, and lateral spreading at the project site. Therefore, impacts to seismic hazards would be *less than significant*. Although mitigation measures are not required as a significant impact has not been identified, the following measure is recommended as a condition of project approval.

RECOMMENDED CONDITION OF APPROVAL: Require implementation of recommendations set forth in the geotechnical investigation prepared for the project as may be updated (Moore Twining Associates 2023), including, but not limited to recommendations regarding: site preparation and grading; excavation; engineered fill requirements; drainage; structural seismic design parameters; structural foundation design; ground improvement; and all other recommendations.

(b) Erosion. According to maps developed as part of the City's *General Plan 2030* and included in the General Plan EIR, the project site consists of Watsonville loam thick surface soils, with 0

to 2 percent slopes (SOURCE V.1b-DEIR Figure 4.10-6). As described in the General Plan EIR, erosion potential for this soil profile is not considered high (SOURCE V.1b-DEIR volume).

Impact Analysis. The project would result in the excavation of approximately 32,200 cubic yards (cy) of soil and approximately 5,700 cy of fill, resulting in a net removal of 26,500 cy. See section VI.10(a) below regarding potential water quality impacts due to grading and earthwork.

Project earthwork would include grading, trenching, and removal of trees and other vegetation. Construction of the proposed project would result in grading and excavation of approximately 1,000 cy of earth material, which would be cut from the site, and approximately 6,000 cy of earth material, which would be filled. Therefore, there would be net import of approximately 5,000 cy of earth material on site. These construction activities would include ground disturbance, which would potentially result in short-term soil erosion. To address potential erosion of on-site soils, building permit project plans will be required to include an erosion control plan that would be implemented during construction. Erosion control measures required on the building permit plan include, but are not limited to: implementation of construction best management practices (BMPs) in accordance with City regulations; installation and inspection of erosion and sediment control BMPs, such as hay bales, filter berms, silt fencing, fiber rolls, and/or other measures; daily checks and sweeping as needed of sidewalk and street; proper storage of construction materials; protection of soil stockpiles from stormwater runoff; installation and maintenance of additional sediment control measures during rainy season (October 15 through April 15); and storm drain inlet/catch basin protection.

The General Plan 2030 EIR concluded that future development accommodated by the Plan could result in erosion during construction but could be mitigated with adherence to local regulations that require implementation of erosion control plans, and thus, potential erosion during construction would be minimized, resulting in a less-than-significant impact. The project will be required to implement erosion control plans and erosion control standards and requirements set forth in the City's Municipal Code Chapter 18.45. (The General Plan 2030 EIR analyses are included on pages 4.10-25 to 4.10-26 of the Draft EIR volume.) Thus, implementation of project erosion control plans would prevent excessive erosion during construction.

In addition, because the proposed project footprint is greater than 1 acre, it would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements for construction site stormwater discharges and would comply with those requirements. A Storm Water Pollution Prevention Plan (SWPPP) is required to be prepared and implemented under these requirements, which includes appropriate erosion-control and water-quality-control measures during site preparation, grading, construction, and post-construction. Implementation of the SWPPP for the proposed project would minimize short-term erosion impacts.

Future development of the project would result in limited disturbance within identified building envelopes and new driveway and walkway areas; development of these areas would

result in 87,015 square feet of new/replaced impervious surface covering soils. Long-term impacts of the proposed project would not result in substantial erosion, as the soils would be covered by buildings, pavement, vegetation, and landscaping. See subsection 10(a) below regarding potential water quality impacts due to grading and earthwork.

Implementation of required erosion control plans and erosion control standards described above and requirements set forth in the City's Municipal Code Chapter 18.45 would address potential soil erosion impacts. For these reasons, the project result in *less-than-significant* soil erosion impact.

c) Geologic Hazards. Non-seismically induced hazards include slope instability, cliff retreat, and non-seismic settlement and landslides (SOURCE V.1a). The project site is relatively level and is not in an area susceptible to landslides (SOURCE V.1b-DEIR Figure 4.10-3). The project site is not located in an area of steep slopes (SOURCE V.1b-DEIR Figure 4.10-5). As described in the geotechnical report, there are no non-seismically induced geologic hazards present on or near the project site. (SOURCE V.13c). Therefore, the project would result in *no impact* related to non-seismic geologic hazards.

(d) Expansive Soils. The geotechnical report prepared for the project included exploratory borings and laboratory testing. Fill soils were encountered generally consisting of very loose to loose silty sands, loose silty clayey sands with gravel, and medium stiff to stiff sandy lean clays. The undocumented fill soils typically contained gravel and/or debris such as brick and concrete debris. The undocumented fill soils were underlain by native soils consisting of various interbedded, discontinuous layers of very soft to hard sandy lean clays, medium dense clayey sands, medium dense poorly graded sands with silt, very loose to medium dense silty sands, loose poorly graded sand, and medium stiff sandy fat clays which extended to depths of approximately 10 to 15 feet BSG where the siltstone rock was generally encountered. The near surface soils consisted of either very loose silty clayey sands or very soft to medium stiff sandy lean clays. These near surface soils were underlain by various interbedded, discontinuous layers of dense clayey sands with gravel and very stiff to hard sandy lean clays over siltstone. Where encountered, the native soils were underlain by Santa Cruz mudstone that generally consisted of slightly friable, moderately weathered and thinly bedded hard siltstone which extended to the maximum depth explored (SOURCE V.13c).

The near surface soils tested exhibited a very low expansion potential, moderate compressibility characteristics, and fair support characteristics for pavements when compacted as engineered fill. In order to reduce the potential for excessive static settlement of surface improvements which are sensitive to settlement, the geotechnical report recommends over-excavation of the existing undocumented fill soils to support new surface improvements on compacted engineered fill soils. Furthermore, due to the shallow groundwater conditions encountered during the geotechnical investigation, the report recommends that contractors should anticipate dewatering and control and management of groundwater will be required for construction of the project. The report also recommends that contractors should anticipate that the onsite soils will be overly moist and will require drying prior to being used as engineered fill. Also, it should be anticipated that the base of excavations will require stabilization due to wet, unstable soil conditions (SOURCE V.13c).

As described above, implementation of recommendations set forth in the project geotechnical report is required by the CBC and City regulations and policies, which would ensure that potential exposure to geotechnical hazards associated with potentially expansive soils would be reduced to a *less-than-significant* level.

(e) Septic Systems. The project would be connected to an existing 8-inch sanitary sewer in Swift Street and would not use septic systems. A septic system would not be used for the proposed project. Therefore, *no impact* would occur.

(f) Paleontological Resources. According to maps developed for the City's *General Plan 2030* and included in the General Plan EIR, the project site is within an area mapped as Late Pleistocene alluvium formations (SOURCE V.1b-DEIR Figure 4.9-5). Late Pleistocene alluvium is one of the four geologic units in the General Plan area known to contain paleontological resources (SOURCE V.1b-DEIR volume).

Impact Analysis. While the project site does not contain known paleontological resources, construction activities could potentially destroy unknown paleontological resources. General Plan Action HA1.2.3 requires the City to notify applicants within paleontologically sensitive areas of the potential for encountering such resources during construction and condition approvals that work will be halted and resources examined in the event of encountering paleontological resources during construction. If the find is significant, the City would require treatment of the find in accordance with the recommendations of the evaluating paleontologist. Treatment may include, but is not limited to, specimen recovery and curation or thorough documentation. The City includes this requirement as a standard condition of approval, and therefore the impact potential impact to paleontological resources would be considered *less than significant*.

STANDARD CONDITION OF APPROVAL: In the event that paleontological resources are encountered during construction, work shall be halted in the vicinity of the find until it can be evaluated by a professional paleontologist. If a find is determined to be significant, treatment of the find in accordance with the recommendations of the evaluating paleontologist shall be required. Treatment may include, but is not limited to, specimen recovery and curation or thorough documentation.

8. Greenhouse Gas Emissions

(a) Greenhouse Gas Emissions. Climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of greenhouse gas (GHG) emissions in the atmosphere. Greenhouse gases trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. Climate change models predict changes

in temperature, precipitation patterns, water availability, and rising sea levels, and these altered conditions can have impacts on natural and human systems in California that can affect California's public health, habitats, ocean and coastal resources, water supplies, agriculture, forestry, and energy use (SOURCE V.1b-DEIR volume).

The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide. The primary contributors to GHG emissions in California are transportation (about 37 percent), electric power production (24 percent), industry (20 percent), agriculture and forestry (6 percent), and other sources, including commercial and residential uses (13 percent). Approximately 81 percent of California's emissions are carbon dioxide produced from fossil fuel combustion (SOURCE V.1b-DEIR volume).

In 2006, the California Legislature passed the Global Warming Solutions Act of 2006 (AB 32), which sought to reduce GHG emissions generated by California to 1990 emissions levels by the year 2020. AB 32 defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrocarbons, perfluorocarbons and sulfur hexafluoride. In 2016, the Legislature followed up with SB 32, which requires California, by 2030, to reduce its statewide GHG emissions so that they are 40 percent below those that occurred in 1990.

In enacting both AB 32 (2006) and SB 32 (2016), the Legislature codified some of the ambitious GHG reduction targets included within certain Executive Orders issued by Governors Schwarzenegger and Brown. The 2020 statewide GHG reduction target in AB 32 was consistent with the second of three statewide emissions reduction targets set forth in former Governor Schwarzenegger's 2005 Executive Order known as S-3-05, which is expressly mentioned in AB 32. (See Health & Safety Code section 38501, subd. (i)). That Executive Branch document included the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; by 2050, reduce GHG emissions to 80 percent below 1990 levels. To meet the targets, the Governor directed several State agencies to cooperate in the development of a climate action plan. The Secretary of Cal-EPA leads the Climate Action Team, whose goal is to implement global warming emission reduction programs identified in the Climate Action Plan and to report on the progress made toward meeting the emission reduction targets established in the executive order.

In 2015, Governor Brown issued Executive Order, B-30-15, which created a "new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050." SB 32 codified this target.

In 2018, Governor Brown issued Executive Order B-55-18, which established a statewide goal to "achieve carbon neutrality as soon as possible, and no later than 2045, and maintain and achieve negative emissions thereafter." The order directs the California Air Resources Board (CARB) to work with other State agencies to identify and recommend measures to achieve those goals.

CARB is the lead agency for implementing AB 32 and SB 32. In accordance with these statutes, CARB conducts an annual statewide GHG Emission Inventory that provides estimates of the

amount of GHGs emitted to the atmosphere by human activities within California. In accordance with requirements of AB 32, CARB adopted an Initial Scoping Plan in 2008 and is required to update the scoping plan at least every five years. The First Update to the Scoping Plan, approved in 2014, established a 2030 emissions target of 40 percent below 1990 levels. The 2017 Scoping Plan identified a balanced mix of strategies to meet the State's 2030 GHG limit.

The current 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) was approved by CARB on December 15, 2022. The 2022 Scoping Plan lays out a path not just to carbon neutrality by 2045, but also to meet the 2030 GHG emissions reduction target. The 2022 Scoping Plan analyzed four scenarios, with the objective of informing the most viable path to remain on track to achieve the 2030 GHG reduction target. The scenario modeling indicates that, if the plan described in the Proposed Scenario is fully implemented, and done so on schedule, the State would cut GHG emissions by 85 percent below 1990 levels, resulting in a 71 percent reduction in smog-forming air pollution, reduce fossil fuel consumption by 94 percent, and create 4 million new jobs, among other benefits (SOURCE V.4a).

The 2022 Scoping Plan details "Local Actions" in Appendix D, which includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under CEQA. The recommendations provided in Appendix D are non-binding and should not be interpreted as a directive to local governments, but rather as evidence-based analytical tools to assist local governments with their role as essential partners in achieving California's climate goals. Appendix D recognizes consistency with a CEQA-qualified GHG reduction plan such as a Climate Action Plan as a preferred option for evaluating potential GHG emission impacts under CEQA (SOURCE V.4b).

The City's *General Plan 2030* includes goals, policies, and actions on climate change, including reducing communitywide GHG emissions 30 percent by 2020, reducing communitywide GHG emissions 80 percent by 2050 (compared to 1990 levels), and for all new buildings to be emissions neutral by 2030.

In September 2022, the City adopted the 2030 Climate Action Plan (CAP) that updates the previous 2020 CAP that was adopted in 2012 and outlines measures and actions that are intended to reduce GHG emissions, per capita, by approximately 40 percent below 1990 levels by 2030, meeting the SB 32 target for 2030 to reduce total GHG emissions 40 percent below 1990 levels. The CAP also seeks to achieve a carbon neutrality goal by the year 2035 prior to the State's target carbon neutrality goal by 2045 (SOURCE V.2c).

The CAP includes 31 measures with 152 associated individual actions, intended to reduce GHG emissions throughout the City. The measures include those related to building energy use and reduction, transportation, public infrastructure, and other climate restoration and sustainable government measures. Through implementation of its measures and actions, the CAP aims to reduce building energy consumption, vehicle miles traveled, solid waste generation, and increase carbon sequestration (SOURCE V.2c).

Impact Analysis. The proposed project would result in direct and indirect GHG emissions during construction and operation. The State CEQA Guidelines do not prescribe specific methodologies for performing a GHG emissions assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA. Global climate change is a cumulative impact; a project's potential impact results through its incremental contribution combined with the cumulative increase of all other sources of GHGs (CEQA Guidelines sections 15064.4 and 15183.5). There are currently no established thresholds for assessing whether the GHG emissions of the proposed project would be considered a cumulatively considerable contribution to global climate change. The MBARD does not have an adopted GHG emissions threshold, except it does have an adopted guideline for stationary source projects in which a project would not have a significant GHG emissions impact if the project emits less than 10,000 metric tons of CO₂e per year or complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions (SOURCE V.6b). As indicated above, while the City's CAP has a per capita emissions target, it is not a threshold for the purpose of CEQA analyses.

However, the City's adopted CAP provides a quantification of emissions reductions that would reduce GHG emissions over time throughout the City, through implementation of the measures and actions included in the CAP. For the purposes of CEQA, the City's 2030 CAP serves as a "Qualified Climate Action Plan" under which the City can streamline the environmental review process of future projects. Pursuant to CEQA Guidelines Section 15064.4(b)(2), a lead agency may consider a project's consistency with an adopted emissions reduction plan in determining significance of a project's GHG emissions. To determine consistency, the City adopted a "Project Review Checklist" as part of the CAP to determine consistency with the CAP on a project-by-project basis. Pursuant to CEQA Guidelines Section 15183.5, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. In order for the CAP to be considered a qualified GHG reduction strategy and provide for CEQA streamlining of GHG emissions analyses for future development, the CAP must identify those measures that are applicable to new development. The CAP includes measures that are applicable to existing developments, municipal government operations, as well as voluntary and mandatory measures to be applied to new development for public and private projects. Mandatory GHG reduction programs that are applicable to new development are summarized in the CAP Project Review Checklist. The CAP Project Review Checklist identifies applicable regulations, applicability, requirements, and monitoring and reporting required by regulations. A development project that demonstrates incorporation of the measures in the CAP Project Review Checklist would be considered consistent with the CAP.

The project applicant completed and submitted the Project Review Checklist, which shows incorporation of measures that would reduce the project's incremental contribution to GHG emissions and climate change, consistent with the City's adopted CAP. Thus, the project

was determined to be consistent with the City's CAP. Therefore, the project would have a *less than significant* impact on GHG emissions.

(b) Conflicts with Applicable Plans. The project would not conflict with state plans adopted for the purpose of reducing GHG emissions. As described above, the Santa Cruz City Council adopted a CAP that addresses citywide greenhouse emissions and reduction strategies. The CAP incorporates a variety of measures and actions that focus on continued efforts to reduce GHG emissions. The CAP provides City emissions inventories, identifies emissions reduction targets for the year 2030 and beyond, and includes measures and actions that are categorized into the following sections with corresponding measures and actions: building energy; transportation; water, waste, and wastewater; climate restoration; climate economy; and sustainable municipal government. These measures address and cover topics related to building energy consumption, solar programs, building electrification, active/public transportation programs, including: ridesharing, electric vehicles, remote work policy and infrastructure, water consumption, solid waste reduction, wastewater treatment, urban forestry, green jobs, and municipal facilities. Each measure has supporting actions, states the GHG reduction potential, lists which City department is responsible for implementation, and explains the advantages and benefits of the specific action. The CAP also includes an Implementation chapter that outlines funding, implementation accountability, and monitoring / reporting procedures for the measures and actions. The proposed project includes features that further reduce GHG emissions, consistent with measures included in the 2030 CAP as described above. The project incorporates GHG reduction measures identified by the City in the CAP Project Review Checklist, and, as explained above, the project was found consistent with the City's CAP. Thus, the project would not conflict with provisions of the CAP, and *no impact* would occur.

9. Hazards and Hazardous Materials

(a,c) Hazardous Material Use, Sites and Emissions. The proposed project consists of new residential uses, which would not involve the routine transport, use, or disposal of hazardous materials or wastes, except for typical household and commercial cleaning supplies, and would not result in the creation of a public health hazard. The project site is located adjacent to and to the north of Gateway School. However, the project consists of residential uses and would not involve emissions of hazardous materials. Thus, the project would not result in the creation of a significant public health hazard and would result in *no impact*.

(b,d) Exposure to Hazardous Materials. According to a Phase I Environmental Site Assessment (ESA) prepared for the project site, the site previously had been identified on numerous databases, and a 'No Further Action' cleanup case was identified on the California Department of Toxic Substance Control (DTSC) EnviroStor website. A Phase I ESA conducted on the project site in 2000 identified one recognized environmental condition (REC) associated with the past uses of the project site. The project site was historically used by the National Guard Armory, and vehicle and tank maintenance were conducted on the site. A limited soil and groundwater assessment was recommended. In May 2002, a Preliminary Endangerment Assessment (PEA) was conducted to address the concerns associated with the former National Guard Armory activities. Elevated concentrations of some constituents of concern (COCs) were identified

above their respective screening levels at that time, but concentrations were deemed to be typical of those found in 'urban environments' and no further action was recommended. DTSC agreed and approved the PEA in July 2002 (SOURCE V.13d).

A Phase I investigation was conducted in 2023 as part of the project studies conducted for the proposed project. Findings from this assessment and a concurrent geotechnical engineering subsurface investigation found groundwater to be at depths ranging from 3 to 6 feet below ground surface, and olfactory observations of petroleum hydrocarbon contamination were observed in the central portion of the project site. Additionally, a review of historical documents for the nearby Santa Cruz Industries facility, located at 411 Swift Street, indicate that monitoring well MW-18, which is located on the Subject Property, has historically had elevated concentrations of TCE above the CalEPA RSLs. Based on these findings, further soil, groundwater and soil vapor assessment was recommended (SOURCE V.13d).

Impact Analysis. Project construction could result in release of and/or exposure to hazardous materials, resulting in a *potentially significant impact*.

Additional investigation was recommended in the Phase I ESA to evaluate the current subsurface environmental conditions. A Phase II ESA was subsequently conducted to collect soil, groundwater, and soil vapor samples for COCs associated with the former presence of a National Guard Armory on the project site. A total of 10 soil borings were drilled to maximum depths of 14 feet BSG across the project site, and four soil gas wells were installed to assess vapor intrusion risk for the proposed school development (SOURCE V.13a).

Soil Sample analytical results revealed detectable diesel and motor oil range hydrocarbons (TPHd and TPHmo), which were detected at multiple locations, but only one soil sample at a depth of 2.5 feet BGS was reported above the residential screening levels for diesel of 260 mg/kg, at a concentration of 5,900 mg/kg. The Phase II ESA determined that additional investigation and/or removal action of the elevated TPHd in near surface soil in the vicinity of boring B10 appears to be warranted. The motor oil range hydrocarbons detected did not exceed the residential or industrial RSL values of 12,000 mg/kg and 180,000 mg/kg, respectively and are therefore considered a low threat to human health and the environment. Toluene and trichloroethylene (TCE) were detected slightly above the laboratory detection limit, but concentrations were below the residential and commercial screening levels. No TPHg, OCPs, SVOCs, or PCBs were detected from the soil samples and are therefore considered a low threat to human health and the environment (SOURCE V.13a).

The arsenic concentration found in near surface soils (2.5 feet) in one boring exceeded the reported naturally occurring background concentrations and the DTSC school program screening level. The Phase II ESA indicated that additional investigation and/or removal action of arsenic in near surface soil in the vicinity of boring B4 appears warranted. The remaining arsenic detected in the site soils appears to be slightly above or below the USGS reported naturally occurring concentrations of 3.5 to 5.7. No remaining heavy metal concentration exceeded their respective residential or industrial human health screening levels and are therefore considered a low threat to human health and the environment. No heavy metal analyzed exceeded total threshold limit concentration (TTL). Chromium

concentrations in one boring at 2.5 feet bgs, equaled 10 times the soluble threshold limit concentration (STLC trigger concentration) for hazardous waste soil classification (for disposal purposes) (SOURCE V.13a).

Soil gas sample analytical results showed detectable concentrations of seven VOCs, two of which had concentrations slightly exceeding residential screening levels (benzene and chloroform) at well locations SG-1 (chloroform), SG-3 (benzene) and SG-4 (benzene). No VOCs were detected above their commercial soil gas screening levels. Benzene and chloroform were not detected in the soil and groundwater samples analyzed at the site, thus the source of the detected benzene and chloroform in soil gas is unknown. The Phase II ESA indicates that additional soil gas sampling should be conducted to confirm if the detected concentrations of benzene and chloroform are present in soil gas at the site that may cause an excessive vapor intrusion risk to the proposed project (benzene and chloroform concentrations are slightly above published residential screening level values, which are used for proposed school sites). In lieu of additional soil gas sampling, a chemical resistant vapor barrier can be installed below the proposed onsite buildings to mitigate the potential vapor intrusion concern (SOURCE V.13a).

Groundwater sample analytical results showed detectable concentrations of TPHd above its respective tap water RSL. TPHmo was detected, however no RSLs have been established for this constituent. The source of TPHd and TPHmo detected in groundwater is likely from elevated concentrations of TPHd and TPHmo present in near surface soil (upper 3 to 4 feet) in the vicinity of the former concrete ramp used for vehicle/tank maintenance/repairs (near boring B10). As such, removing the near surface soil (upper 3 to 4 feet) in the vicinity of the former concrete ramp (near boring B10) would likely reduce the TPHd and TPHmo concentrations presence in the groundwater. Concentrations of TCE were detected in several borings at concentrations ranging from 0.56 µg/L at boring B4 to 3.7 µg/L at boring B5, which all exceed the tap water RSL of 0.49 µg/L, but are below the published California Maximum Contaminant Level (MCL) for drinking water of 5.0 µg/l. Additionally, soil and soil gas samples collected at the Subject Property did not indicate TCE as an onsite source for the groundwater detection. As such, the source of TCE detected in groundwater is likely associated with the nearby Santa Cruz Industries case (GEOTRACKER ID#: SLT3S0011280) that is located about 400 feet north (upgradient) of the project site (SOURCE V.13a).

Mercury was detected in groundwater at estimated concentrations ranging from 37 µg/L to 48 µg/L, above the California drinking water MCL value of 2.0. The remaining heavy metals were below their respective tap water RSL values or were not detected. No SVOCs nor PCBs were detected in the groundwater samples (SOURCE V.13a).

Based on the findings of this Phase II ESA, additional environmental assessment and/or soil removal action is recommended. *Implementation of Mitigation Measures 1, 2 and 3 would reduce the impact to a less-than-significant level.*

MITIGATION MEASURE HAZ-1: Prepare and implement a soil removal action plan for additional investigation and/or removal of the elevated TPHd in near surface soil (upper 3 to 4 feet) in the vicinity of boring B10 (near the former concrete ramp used

for vehicle/tank maintenance/repairs) and elevated arsenic in near surface soil (upper 3 to 4) in the vicinity of boring B4.

MITIGATION MEASURE HAZ-2: Conduct additional soil gas sampling to confirm if the detected concentrations of benzene and chloroform are present in soil gas at the site that may cause an excessive vapor intrusion risk to the proposed school development (benzene and chloroform concentrations were detected slightly above published residential screening level values which are used for proposed school sites). In lieu of additional soil gas sampling, a chemical resistant vapor barrier can be installed below the proposed onsite buildings during future development to mitigate the potential vapor intrusion concern.

MITIGATION MEASURE HAZ-3: Prepare and implement a soil and groundwater management plan to address handling and management of impacted soil and/or groundwater that could be potentially encountered during construction activities. The detected concentrations of TPHd, TPHmo, TCE, arsenic, and chromium in soil and/or groundwater may require special handling/testing and increase construction cost if soil/groundwater is required to be exported/disposed of offsite.

(e) Location Near Airports. The project site is not located within two miles of a public airport or private airstrip. Therefore, the project would result in *no impact*.

(f) Emergency Response. Existing and proposed access to the project site is from Swift Street. The project would not include any changes to existing public roadways that provide emergency access to the site. Therefore, the project would have *no impact* related to interference with adopted emergency response or evacuation plans.

(g) Wildland Fire Hazard. The General Plan 2030 EIR indicated that future growth could result in an indirect increased risk of wildfires in the urban-rural interface and adjacent to the City's greenbelt areas. The EIR indicates that areas targeted as "likely" to have a wildland fire include the Arroyo Seco/Meder Canyon, DeLaveaga, Pogonip, Moore Creek area and Arana Gulch, and future growth in these areas could result in an indirect increased risk of wildfires in the urban-rural interface and adjacent to the City's greenbelt areas.

According to maps developed for the City's *General Plan 2030* and included in the General Plan 2030 EIR, the project site is not located within a high fire hazard area (SOURCE V.1b-DEIR Figure 4.6-1). The project is located in an urban area and does not contain significant sources of flammable materials (e.g., timber land). The project would meet all City requirements for access, and the building would be required to install fire sprinkler systems in accordance with City regulations. Therefore, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, resulting in *no impact*. See also section IV.20 below. See also section VI.20 below.

10. Hydrology and Water Quality

(a) Water Quality/Discharges. The proposed project does not involve any discharges that would violate any water quality standards or waste discharge requirements.

Within urbanized areas such as the City, pollutants frequently associated with stormwater include sediment, nutrients, oil and grease, heavy metals, and litter. The primary sources of stormwater pollution in urban areas include automobiles, parking lots, landscape maintenance, construction, illegal connections to the stormwater system, accidental spills, and illegal dumping.

Urban runoff and other “non-point source” discharges are regulated by the 1972 Federal Clean Water Act (CWA), through the National Pollutant Discharge Elimination System (NPDES) permit program that has been implemented in two phases through the California Regional Water Quality Control Boards (RWQCB). Phase I regulations, effective since 1990, require NPDES permits for storm water discharges for certain specific industrial facilities and construction activities, and for municipalities with a population size greater than 100,000. Phase II regulations expand the NPDES program to include all municipalities with urbanized areas and municipalities with a population size greater than 10,000 and a population density greater than 1,000 persons per square mile (SOURCE V.1b-DEIR volume).

The City has developed a Storm Water Management Program (SWMP) in order to fulfill the requirements of the Phase II NPDES General Permit for Discharges of Storm Water from Small Municipal Separate Storm Sewer Systems (MS4) (General Permit) and to reduce the amount of pollutants discharged in urban runoff. In compliance with the Phase II regulations, the City’s comprehensive SWMP is designed to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP) and to protect water quality (SOURCE V.1b-DEIR volume). The City also adopted an ordinance for “Storm Water and Urban Runoff Pollution Control” (Chapter 16.19 of the City’s Municipal Code), as part of its Storm Water Management Plan in accordance with the RWQCB’s requirements. The ordinance identifies prohibited discharges and required BMPs for construction and new development. City regulations (Municipal Code section 16.19.140) requires that any construction project, including those undertaken under any permit or approval granted pursuant to Titles 15 (Streets and Sidewalks), 18 (Buildings and Construction), and 24 (Zoning) of the Municipal Code, shall implement 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. The City’s BMP manual requires a development project to include structural or treatment control BMPs, or a combination of BMPs, to reduce potential pollutant loadings in storm water runoff to the maximum extent practicable.

Impact Analysis. The project could result in water quality degradation due to stormwater runoff and potential erosion during construction. However, the project is consistent with the City’s stormwater management requirements, and potential erosion will be controlled with implementation of an erosion control plan as explained above in section VI.7(b), resulting in a *less-than-significant impact*.

The City's mandatory BMPs, as detailed in the latest BMP manual published by the City's Public Works Department, must be implemented to protect water quality into the municipal storm drain system. The project would also be subject to the Central Coast Post-Construction Requirements (PCRs) that were enacted by the Central Coast RWQCB in July 2013. The PCRs are for projects that create and/or replace $\geq 2,500$ square feet of impervious surfaces. Based on the amount of new/replaced impervious surface area created by the project (approximately 87,015 square feet), the project would be required to comply with Tiers 1 through 4 (Site Design, Water Quality Treatment, Runoff Retention, and Peak Management).

The project has claimed technical infeasibility for Tier 3 Runoff Retention therefore per the (PCRs); on-site retention of the full retention volume is not required, and the project is required to dedicate no less than ten percent of the regulated project's equivalent impervious surface area (EISA) to retention-based measures. The project is also exempt from Tier 4 Peak Management due to the following (PCRs) special circumstances condition: Project runoff discharges to a continuous underground storm drain system that discharges to marine near-shore waters.

The project site is currently partially developed, and its impervious surface area would increase with the development of the proposed project. New impervious surfaces could increase the delivery of urban pollutants to vicinity storm drains or water courses, but none exist on or adjacent to the project site. A schematic stormwater control plan has been prepared for the project that details drainage features to collect and treat stormwater runoff. The plans note that stormwater would be controlled through new biofiltration rain garden areas, pervious walkways and associated storm drains, along the perimeter of the project site and along the proposed pedestrian pathway to Sergeant Derby Park. These drainage areas would flow to a Swift Street public storm drain inlet. Incorporation of these measures to treat stormwater runoff would be consistent with City stormwater management requirements.

Project construction would include grading that could result in short-term soil erosion. As indicated in subsection 7(b) above, an erosion control plan would be required to be implemented during construction, in accordance with City regulations, including implementation of construction BMPs. In addition, construction activity on projects that disturb one or more acres of soil, which includes the proposed project, must obtain coverage under the State's General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list best BMPs that the discharger will use to protect stormwater runoff and the placement of those BMPs. A Notice of Intent (NOI) and SWPPP must be prepared prior to commencement of construction. Implementation of the SWPPP would further minimize short-term erosion impacts.

In addition, the project would be required to implement the City's regulatory requirements and BMPs, as detailed in the "Stormwater Best Management Practices Manual" published

by the City's Public Works Department. Part of these requirements include incorporating pollution source control measures for various pollution sources (i.e. trash storage areas, parking areas, etc.). Site-specific pollution source controls are included in the project's stormwater control plan.

Compliance with regulations contained in the City's Municipal Code regarding design of stormwater drainage systems to meet water quality standards (section 24.14.050 of the City's Municipal) and implementation of stormwater BMPs, grading requirements and implementation of erosion control plans (Chapters 16.19 and 18.45 and section 24.14.060), as well as preparation and implementation of a SWPPP as may be required during construction, would mitigate potential storm runoff water quality and erosion impacts resulting from increased stormwater and construction activities. Project stormwater drainage improvements will be designed in accordance with City standards and Public Works requirements in order to meet water quality standards. Therefore, the project would result in a *less-than-significant impact* related to water quality. The project would not result in waste discharge that would violate any water quality standards, resulting in *no impact*.

(b) Groundwater. The City is primarily developed, and no groundwater recharge areas are identified or mapped in the City's *General Plan 2030* or *General Plan 2030 EIR*; groundwater resources utilized as part of the City's water supply are obtained from aquifers outside of the City (SOURCE V.1b-DEIR volume). The *General Plan 2030 EIR* concluded that development accommodated by the *General Plan* would not be located within groundwater recharge areas and would have no effect on recharge capabilities, and therefore, would not deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. (The *General Plan 2030 EIR* analyses are included on pages 4.5-40 to 4.5-42 of the Draft *EIR* volume.) Development within groundwater mapped recharge areas also is regulated in Municipal Code section 24.14.090 in order to minimize adverse environmental impacts.

The project site is located within a developed urban area with a mix of residential, light industrial, and public facility uses in the immediate vicinity. The project would be connected to the City's public water system and does not include the use of a groundwater well. Therefore, the project would not affect groundwater supplies or recharge or impede sustainable groundwater management of the basin and would result in *no impact* regarding groundwater.

(c[i-iii]) Drainage. The project site is located within a developed urban area. The site is partially developed and also contains non-native vegetation. The site currently drains to a storm drain inlet, storm manhole and storm drain pipe in Swift Street.

Impact Analysis. Project development would result in a net increase of impervious surfaces. On-site stormwater retention and filtration is planned through engineered control measures detailed in the project's stormwater control plans. These plans are designed so that the project would not generate a flow of stormwater that would exceed the capacity of storm water facilities, or result in substantial erosion.

A project's stormwater would be required to be maintained at pre-development runoff levels in accordance with *General Plan* and City requirements. The project is exempt from

peak management (Tier 4) requirements and pre-development run-off levels under the following (PCRs) special circumstances condition: Project runoff discharges to a continuous underground storm drain system that discharges to marine near-shore waters. The project proposes to discharge to continuous underground storm drainage pipeline from Swift Street fronting the site to an ocean outfall at the end of Merced Avenue.

The project would not alter existing drainage patterns. The project would be compliant with Section 24.14.050 of the City's Municipal Code that requires preparation of a drainage plan and improvements that would be required to be designed in accordance with City standards and Public Works requirements in order to meet water quality standards. For these reasons, the proposed project would not result in significant drainage impacts. Therefore, the project would result in a *less-than-significant impact* related drainage.

(c [iv], d) Flood and Tsunami Zones. The project site is not located within a Federal Emergency Management Agency (FEMA) flood hazard area (SOURCE V.1b-DEIR Figure 4.7-1). The project site is not in a tsunami inundation zone (SOURCE V.1b-DEIR Figure 4.7-2). Therefore, the project would result in *no impact* related to release of pollutants in flood or tsunami zones.

Sea Level Rise. The General Plan 2030 EIR reported that sea level rise, storms of increasing intensity, and an alternating series of floods and droughts threaten the City of Santa Cruz in the coming decades. The City prepared a "Climate Adaptation Plan" with funding from FEMA. The objectives of this Plan are to identify and evaluate the potential impacts of climate change on the City of Santa Cruz, analyze the severity of the hazards that the City faces, and develop potential adaptation responses to reduce the risk and exposure of the City to these hazards. The potential risks were identified in a "Vulnerability Study" that identified potential facilities vulnerable to risks of sea level rise, including beaches, the City's wastewater treatment facility, and the Santa Cruz Harbor (SOURCE V.1b, DEIR volume). The Climate Adaptation Plan Update 2018-2023, adopted by the City Council in October 2018, further addresses sea level rise.

The project site is not located within an area identified as being subject to potential effects of coastal storm hazards or sea level rise (SOURCE V.2h). The project site also doesn't contain any critical facilities, listed in the Climate Adaptation Plan, which provide essential services and protect life and property within the City. Thus, there would be *no impact* related to sea level rise.

(e) Conflict with Plans. The project site is not located adjacent to a water course or water body. The proposed project would not result in new discharges or conflict with provisions in the Central Coast Basin Plan as stormwater would be treated as described above that include flow-through planters, self-treating biofiltration areas, and underground chambers for retention, which would prevent water quality degradation in accordance with the City's stormwater requirements. A sustainable groundwater management plan for the area in which the project is located has not yet been prepared. Therefore, the project would not conflict with or obstruct implementation of an adopted water quality or groundwater plans; the project would result in *no impact*.

11. Land Use and Planning

(a) Physical Division of Community. . The project site is located within a developed urban area of the City. The project would not physically divide an established community and would result in *no impact*.

(b) Consistency with Local Policies/Plans. Based on the analyses contained in this Environmental Checklist and City staff review of the *General Plan 2030*, the proposed project would not result in a conflict with any policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact and would result in *no impact*.

12. Mineral Resources

There are no mines or areas of known mineral resources within the City (SOURCE V.1b-DEIR). Therefore, the project would have *no impact* on mineral resources.

13. Noise

(a) Noise Increases. The project area is located in the Lower Westside neighborhood. The noise assessment conducted for the General Plan 2030 EIR indicates that Swift Street south of Delaware Avenue does not fall within a mapped existing noise contour. (SOURCE V.1b-DEIR Figures 4.13-1 and 4.13-2). Ambient noise levels are characterized by vehicular traffic and activities along Swift Street and adjoining streets. The nearest sensitive noise receptors are Gateway School to the south of the project site and residential uses located across Swift Street, approximately 55 feet east of the project site.

For multi-family residential uses, normally acceptable exterior noise levels are 65 dB and conditionally acceptable levels are identified as 60-70 dB (SOURCE V.1b-DEIR volume). An interior CNEL of 45 dBA is mandated by the State of California Noise Insulation Standards (California Code of Regulations, Title 24, Part 6, Section T25 28) for multiple-family dwellings and hotel and motel rooms. Since normal noise attenuation within residential structures with closed windows is about 20 dBA, an exterior noise exposure of 65 dBA Ldn allows the interior standard to be met without any specialized structural attenuation (e.g., dual paned windows) (Ibid.). For typical residential construction (i.e., light frame construction with ordinary sash windows), the minimum amount of exterior to interior noise reduction is at least 20 dBA with exterior doors and windows closed and approximately 15 dBA with windows partially open for ventilation. Buildings constructed of stucco or masonry with dual-glazed windows and solid core exterior doors can be expected to achieve an exterior to interior noise reduction of approximately 25-30 dBA (Ibid.).

At the end of 2018, amendments to the State CEQA Guidelines were adopted by the State of California that included changes to the Appendix G environmental checklist, including elimination of questions related to exposure to noise. The questions focus on the potential temporary and permanent noise generated by a project.

Impact Analysis. the proposed project would result in varying increases in temporary and permanent noise levels as discussed below. The nearest sensitive noise receptors are residential uses located across Swift Street, approximately 55 feet east of the project site.

Temporary Noise Increases. There would be a temporary increase in existing noise levels during demolition, earthwork, and construction of the project, which is anticipated to occur over a period of approximately two years and three months. Construction noise levels would depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors, as well as existing ambient noise levels. The highest noise levels would be generated during demolition and grading, with lower noise levels occurring during building construction and paving. As explained in the General Plan 2030 EIR, construction sound levels would be intermittent and varied through a single day as well as throughout the duration of project construction. In addition, as indicated in the General Plan EIR, the noise levels would decrease with distance from the construction site at a rate of approximately 6 dBA per doubling of distance.

The *General Plan 2030* includes goals, policies, and actions that set forth measures to avoid and minimize adverse impacts of increased noise resulting from construction or operation of development projects (HZ3.1.1, HZ3.1.2, HZ3.1.3, and HZ3.1.5). The General Plan 2030 EIR concluded that with implementation of General Plan policies and adherence to City regulations, temporary noise impacts from future development would be less than significant. The General Plan EIR concluded that development accommodated by the plan would result in construction of varying sound levels and duration, but with implementation of General Plan policies and actions that set forth measures to minimize exposure to construction noise levels, the increase in temporary noise levels from construction-related activities would be considered less than significant. General Plan policies seek to minimize and monitor construction noise (HZ3.1.3, HZ3.1.5). In particular, the General Plan seeks to ensure that construction activities are managed to minimize overall noise impacts on surrounding land uses (HZ3.1.3). (The General Plan 2030 EIR analyses are included on pages 4.13-20 to 4.13-22 of the Draft EIR volume.)

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 may be required by the City to manage and minimize construction noise impacts of development projects per proposed General Plan Actions HZ3.1.3 and HZ3.1.5 (SOURCE V.1b-DEIR volume).

Construction of the proposed project would result in temporary increases in noise levels that would be variable throughout the construction period. Sensitive noise receptors in the vicinity would experience a temporary increase in noise levels. However, construction sound levels would be intermittent and varied through a single day as well as throughout the duration of project construction, and construction noise levels would decrease with

distance from the construction site. Overall, construction noise levels would be temporary and short-term, and would fluctuate throughout the construction period with the construction activities producing higher noise levels occurring earlier in the construction phase. Therefore, construction noise would not result in substantial increases in temporary noise levels, and the project would result in a *less-than-significant impact* regarding temporary noise increases.

Permanent Noise Increases. The project would result in new residential development, which is not a land use that is typically associated with activities that would generate substantial permanent increases in ambient noise levels. Operational noise from the project would include exterior mechanical equipment. The project parking area would be a surface parking lot along the northern portion of the project site. The parking lot would be surrounded by exterior walls along the northern project perimeter which would create a shield to vehicular noise.

The project mechanical equipment would largely be limited to the roof. Mechanical equipment would be enclosed and/or screened in order to attenuate sound from this source and to comply with City regulations. Section 24.14.260 prohibits five dB (dBA) increases of sound levels above the local ambient noise level on a residential property. In addition, Municipal Code section 24.14.220 indicates that no land or building in any district shall be used or occupied in any manner so as to create noise or vibration in such a manner or in an amount as to adversely affect the surrounding area or adjoining premises. Municipal Code section 9.36.010 prohibits offensive noise between the hours of 10 PM and 8 AM, and section 9.36.020 prohibits unreasonably disturbing noises. These regulations are intended to prevent increases in ambient noise levels. The following standard condition of approval will be included in the Project Conditions of Approval.

STANDARD CONDITION OF APPROVAL: All new mechanical equipment and appurtenances, including gas and water meters, electrical boxes, roof vents, air conditioners, antennas, etc. visible from the public way and from adjacent properties, shall be screened with material compatible with the materials of the building and shall be subject to the approval of the Zoning Administrator. Prior to issuance of a building permit, the applicant shall provide documentation confirming that all heat pumps comply with the City's noise standards.

Net traffic increases resulting from the project would contribute to incremental increases in noise, but would not be of the magnitude to result in a significant impact. The proposed project would result in a net increase of approximately 18 AM peak hour trips and 27 PM peak hour trips, which, when added to existing traffic volumes, would result in a minor increase noise levels by less than 0.5 dB, which is less than the 3-dB increase identified for significant impacts in the General Plan 2030 EIR. Thus, the project would not result in a significant increase in noise levels due to increase vehicle trips.

Therefore, the project would not result in generation of a significant temporary or permanent increase in ambient noise levels, and impacts are considered *less-than-significant impact*.

(b) Vibration. Vibration is an oscillatory motion through a solid medium, in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Typically, groundborne vibration generated by heavy equipment or traffic on rough roads attenuates rapidly with distance from the source of the vibration so that potential impact areas are confined to short distances. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. Vibration decreases rapidly with distance.

Impact Analysis. The project would not result in generation of or exposure to vibration as the proposed residential uses are not known to be sources of vibration. The General Plan 2030 EIR indicates that there were no planned land uses that would be expected to result in generation of groundborne vibration, and that the potential for vibration is mostly associated with construction-related impacts.

Standard construction equipment typically does not generate substantial levels of vibration. The project geotechnical investigation (SOURCE V.13c) recommends use of deep ground modification, such as rigid inclusions or deep cement soil mixing, or a deep foundation system method, such as auger cast piles, to provide foundation support due to liquefaction conditions at the site. However, neither of these methods would result in significant vibration levels that might otherwise occur with activities such as pile-driving.

In conclusion, project construction or future residential uses would not result in activities or use of equipment that would create excessive vibration or expose people to excessive vibration and impacts would be *less than significant*.

(c) Location Near Airport. The closest public airport is the Watsonville Municipal Airport located more than 10 miles south in the City of Watsonville. The Bonny Doon Airport, a private airstrip, is located approximately 9.1 miles north of the project site. The project is not located near a public airport or private airstrip, and therefore would result in *no impact*.

14. Population and Housing

(a) Population Growth. The City had a population of 62,776 people as of January 1, 2024 (SOURCE V.5). The project's proposed 100 residential units would result in an increased population of approximately 224 residents based on the City's existing average household size of 2.24. With the addition of the project's residents, the City's population would total 63,000. This is within the adopted regional population forecast of 72,218 for the City of Santa Cruz for the year 2030 (SOURCE V.3a). Thus, the proposed project is consistent with current regional forecasts and would not substantially induce unplanned population growth. Therefore, this increase in

population would be within planned growth, and the project would result in a *less-than-significant impact* related to population growth.

(b) Displacement of People or Housing. No housing units exist on the project site. Therefore, the project would not result in the displacement of people or housing. The project would result in future construction of 100 new residential apartment units, thus creating more housing opportunities in the City. Therefore, the project would result in *no impact*.

15. Public Services

(a-b, e) Fire, Police and Other Public Services. The project would be served by existing public services. The proposed project would result in an incremental demand for police and fire protection services and other public services provided by the City of Santa Cruz. A recent review of cumulative impacts on City fire and police protection services was conducted as part of an EIR prepared for another proposed residential project located with the City (SOURCE V.2a). The review included the proposed project and cumulative development projects as part of the review and concluded that future police services demand would not lead to the need for new or expanded City Police Department facilities (SOURCE V.2a).

The review found that the City's Fire Department currently has inadequate space and equipment to meet existing needs, which would be further impacted by cumulative development. Potential expanded or new fire facilities would be located at the existing eastside location of Station 2 and possibly near UCSC. Expansion or new construction would be considered infill development at this site, which is surrounded by development. While existing and cumulative development may require new or physically altered fire protection facilities, locations for expansion or construction are expected to be located within developed areas and were not expected to result in significant physical impacts (SOURCE V.2a).

Thus, the proposed project would have no measurable effect on existing public services in that the incremental increase in demand would not require expansion of any facilities to serve the project. New development would be required to install automatic fire sprinklers and alarms in accordance with City requirements and comply with other Fire Department recommendations regarding access. Therefore, the project's impact to fire, police and other public services would be *less than significant*.

(c) Schools. Schools and educational services are provided to City residents by the Santa Cruz City Schools District (SCCS), as well as a number of private schools, for grades K through 12. There are five elementary schools, and the secondary district includes two middle schools, three comprehensive high schools, a continuation school, an independent studies program and a home school program with a combined existing student population of approximately 6,134 students (SOURCE V.7). According to the District's updated 2024 Developer Fee Justification Study for the Santa Cruz School Districts, District facilities have the capacity to accommodate 6,262 students (SOURCE V.7).

Impact Analysis. The project would result in future construction of 100 residential units. The proposed residential units would be served by the SCSD. Development of the project would

result in an estimated student enrollment increase of approximately 21 students throughout all grades.³ Schools serving the project site (Bay View Elementary School, Mission Hill Middle School, and Santa Cruz High School) have adequate capacity to serve the project based on current enrollments⁴ and school capacities identified in the General Plan 2030 EIR (SOURCE V.1b-DEIR volume). Expansion of existing facilities would not be required to serve the project, and therefore, the project would result in a *less-than-significant impact* related to school facilities.

In accordance with Section 65995(h) of the California Government Code, the project would be required to pay school impact fees to the SCSO at the time of the building permit issuance. These fees are used to mitigate impacts associated with long-term operation and maintenance of school facilities. The project applicant's fees would be determined at the time of the building permit issuance and would reflect the most current fee amount established by the SCSO. School fees from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment growth within the SCSO service area and would allow for the SCSO to allocate these funds as deemed necessary. Pursuant to Government Code Section 65995, payment of development fees is "full and complete mitigation" for impacts on schools. Therefore, the project would result in a *less-than-significant impact* on public schools.

(d) Parks. The City manages, maintains and operates more than 1,700 acres of parks and open space lands, including various community/recreational facilities. The City has responsibility for management, maintenance, and operation of over 1,700 acres of parks and open space lands, and various community/recreational facilities, and oversees development of new parks and improvements within City-owned parks, open space, and community facilities. The nearest recreational facilities to the project site include: 1) Sergeant Derby Park, located adjacent to the western perimeter of the project site, 2) Natural Bridges State Beach, located south of Delaware Avenue adjacent to Swanton Boulevard, 3) Garfield Park, located south of Pendegast Avenue between Almar Avenue and Seaside Street, and 4) West Cliff Drive and beaches a few blocks south of the project site.

The General Plan 2030 established per capita goals for neighborhood and community parks to ensure adequate parks throughout the City. The City's standard is to provide neighborhood parks at a ratio of 2.0 acres per 1,000 people with a service radius of ½ mile. The City's goal for community parks is 2.5 acres per 1,000 people with a service radius of 1.5 miles. According to the Parks Master Plan 2030, the City is currently underserved for neighborhood and community park space. To meet existing goals, a total of 67 acres of parks would need to be created to meet the forecasted population growth associated with the City of Santa Cruz General Plan 2030 growth estimates (SOURCE V.2f).

³ Based on an average generation rate of .2132 students per household per the SCSOs 2024 *Developer Fee Justification Study for the Santa Cruz School Districts*, Schoolworks Inc., June 2022, page 5.

⁴ California Department of Education. 2024. California School Directory-School Profiles. Available online at <https://www.cde.ca.gov/SchoolDirectory/>.

The Parks Master Plan does not specify locations for new parks or recreational facilities, but some of the Plan's policies and actions support new and expanded recreational uses and/or facilities. For many recommended new or expanded uses, specific site locations are not identified in the Master Plan, and, in some cases, additional study is recommended in order to identify suitable locations. The Parks Master Plan supports consideration of recreational facilities, identified below, after additional studies are conducted in the future to further evaluate potential uses and site locations. In addition, new, expanded or renovated facilities or structures are recommended in the Parks Master Plan at a variety of existing parks throughout the City, including San Lorenzo and DeLaveaga Parks (SOURCE V.2f).

Impact Analysis. The project would result in future construction of 100 residential units with an estimated population of approximately 224 new residents based on city-wide average household size. Project residents would use a range of neighborhood and regional parks in the vicinity and surrounding area. The increased population resulting from the Project would not, in and of itself, trigger the need for a new park as it does not meet the City's standard for a new neighborhood park, and existing nearby parks would be adequate to serve the Project's residents.

While the City's Parks Master Plan 2030 identifies an existing deficit of 67 acres of park land throughout the City, this is an existing condition that cannot be corrected by any one individual development project, especially given limited availability of land for new parks. The City's 2030 Parks Master Plan identifies park needs and improvements to existing parks and recreational facilities but does not propose creating additional park land. The Master Plan includes improvements to existing facilities, and no new parks or facilities are specifically identified. The projects and recommendations in the Parks Master Plan are intended to support the City's resident and visitor population. Furthermore, the Parks Master Plan identifies potential new facilities and uses that could be developed throughout the City after further study and also recommends a broad range of improvements and upgrades for existing facilities and potential new facilities, which would be in support of the Plans goals and policies to provide adequate parks and recreational facilities throughout the City for its population.

Thus, the proposed project and associated residential demand for parks would not be of a level that would require new or physically altered parks, and the project's impact regarding parks and new for new or expanded facilities is *less-than-significant*.

16. Recreation

(a) Use of Existing Parks and Recreational Facilities. As indicated above, the proposed project would result in an increase in residential population with an incremental increased demand for, and use of, public parks and recreational facilities, and there are several nearby parks that could serve project residents. The incremental increased use of public parks resulting from the project would be spread throughout a number of parks and facilities throughout the day. The level of use by future project residents would not be considered substantial in that it is not expected that park or recreational facility use as a result of the project would lead to substantial

deterioration of any one park facility. Therefore, impacts on existing parks and recreational facilities would be *less than significant*.

Furthermore, the City imposes a “Parks and Recreation Facilities Tax” (pursuant to Chapter 5.72 of the Municipal Code) on new residential development 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” (Municipal Code section 5.72.100).

(b) New Recreational Facilities. The project does not include public recreational facilities. Therefore, the project would result in *no impact* related to potential significant impacts resulting from provision of new park or recreational facilities.

17. Transportation/Traffic

(a) Conflict with Circulation Plan, Policy, or Ordinance. The project site is located on Swift Street between Delaware Avenue and Modesto Avenue. Project access will be provided via an existing driveway on Delaware Avenue. The project will also be accessed through a new easement through the neighboring industrial land use to the north, connecting Swift Street and Delaware Avenue. A total of 119 parking spaces are proposed for the development on a new surface parking lot. Additionally, the project applicant is proposing improvements in the Swift Street public right-of-way and frontage, including construction of a sidewalk per City standards.

The local roadway network serving the project site includes Highway 1 (State Route 1), Mission Street, Swift Street, and Delaware Avenue. The Santa Cruz Metro Transit District (METRO) has bus route service along Delaware Street, Mission Street, and Swift Street. Local METRO bus stops are located at the intersection of Delaware Avenue and Swift Street, approximately 200 feet north of the project site (Route 20) and along the intersection of Mission Street and Swift Street (Routes 18 and 40), approximately 0.38 mile north of the project site. Pedestrian and bicycle facilities are located in the area, including the multi-use path along the Santa Cruz Coastal Rail Trail. The project includes 129 bicycle parking spaces and 2 bicycle “fix-it” stations for residents and visitors. Swift Street is developed with Class II bike lanes, and the project vicinity has multi-use paths, transit stops, and City-sponsored bike share program.

The *General Plan 2030* includes goals, policies and actions that set forth comprehensive measures to reduce vehicle trips, increase vehicle occupancy, encourage use of alternative transportation modes, and promote alternative-sustainable land use patterns, all of which would help reduce vehicle trips, avoid and minimize adverse impacts related to traffic. In particular, several policies and actions that call for implementation of road, pedestrian, bicycle and transit improvements through the City’s Capital Improvement Program and other sources (M2.1.3, M2.3.2, M3.2.2). The proposed project is an infill, mixed-use development project that is encouraged in the General Plan and is located in area designated for higher density that is proximity to transit, bicycle and pedestrian facilities. Thus, the project is consistent with City policies that promote sustainable land use patterns, mixed-use development, and consolidation of parcels along transit corridors to encourage use of other transportation modes (LU4.2, 1, LU4.2.1, LU3.7, LU3.8, CD3.3, and M1.1).

The City's General Plan strives to maintain the established "level of service" D or better at signalized intersections (M3.1.3). "Level of service" (LOS) is typically used to evaluate traffic operations, in which operating conditions range from LOS "A" (free-flowing) to LOS "F" (forced-flow). Caltrans endeavors to maintain a target LOS at the transition between LOS C and D on State highway facilities. The City's General Plan also accepts a lower level of service and higher congestion at major regional intersections if necessary improvements would be prohibitively costly or result in significant, unacceptable environmental impacts (M3.1.4).

According to a project-specific Trip Generation Analysis, the project would result in a net increase of 559 daily weekday trips, including an increase of 18 AM peak hour trips and 27 PM peak hour trips. These increases would not result in substantial changes in roadway operations or LOS due to the minimal volume spread out over the day and hour and at different intersections. The proposed project is located in proximity to bus, bicycle, and pedestrian facilities and close to neighborhood businesses and activity centers on the westside, such that alternative transportation modes like would be used for some of the project's daily trips, and the project amenities supports use of other transportation modes.

The project would not conflict with any policies, programs or regulations addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project is located in a developed area near transit, services, and recreation with a sidewalk and bike lane network. The project provides onsite bicycle parking facilities in accordance with City requirements. The project location is in proximity to transit, bicycle, and pedestrian facilities, which would facilitate use of alternative modes of transportation, consistent with General Plan transportation policies and goals. Therefore, the project would not conflict with plans or policies regarding the City's circulation system. Additionally, the project would be required to pay the City's traffic impact fee at the time of building permit issuance. These fees are used to address needed traffic improvements at key intersections for circulation and also for alternative transportation improvements; 15 percent of the collected traffic impact fees are allocated to alternative transportation improvements. Therefore, the project would result in *no impact* with regards to potential conflicts with circulation policies.

(b) Conflicts with State CEQA Guidelines. CEQA Guidelines section 15064.3, subdivision (b) codifies the switch from LOS to vehicle miles traveled (VMT) as the metric for transportation analysis pursuant to state legislation adopted in 2013. In September 2013 Governor Brown signed Senate Bill 743 which made significant changes to how transportation impacts are to be evaluated under CEQA. SB 743 directs the Governor's Office of Planning and Research (OPR) to develop a new metric to replace LOS as a measure of impact significance and suggests vehicle miles travelled as that metric. According to the legislation, upon certification of the guidelines, automobile delay, as described solely by LOS shall not be considered a significant impact (Section 21009(a)(2)). SB 743 also creates a new CEQA exemption for certain projects that are consistent with the regional Sustainable Communities Strategy.

CEQA Guidelines section 15064.3(b) indicates that development projects that exceed an applicable VMT threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-

quality transit corridor should be presumed to cause a less-than-significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

In accordance with the amended CEQA Guidelines, the City has transitioned from intersection LOS formerly used for traffic impact analyses to VMT as the metric for determining potentially significant impacts. The City adopted a VMT transportation threshold on June 9, 2020 in accordance with CEQA and state requirements, as well as VMT Implementation Guidelines that are consistent with the State's SB 743 Guidelines. The threshold generally establishes that a project exceeding a level of 15 percent below the County-wide average VMT may result in a significant transportation impact. The City's adopted SB 743 (VMT) Implementation Guidelines include potential Transportation Demand Management (TDM) measures to help achieve VMT reduction. Updates to the City's Guidelines were adopted on June 14, 2022.

The City's guidelines to determine whether a land use project is within the VMT threshold includes a screening process in which situations are identified under which projects are determined to not have a significant impact and further VMT analysis is not required. The guidelines require that each distinct land use for a mixed-use project be analyzed separately unless they are determined to be insignificant to the total VMT. The guidelines also state that housing projects are expected to cause a less-than-significant impact on VMT if a high percentage of the project is affordable, as determined by the City. Furthermore, projects, or portions of a project, that meet the screening criteria do not require a CEQA transportation analysis, and such projects, or portions of a project, will have a non-significant CEQA transportation impact based on their project location and characteristics. According to the City's guidelines, projects that would not be expected to result in a significant VMT impact and that are screened out from further transportation impact review include:

- Small projects that generate fewer than 110 trips per day;
- Projects near high quality transit: within a ½ mile of a major transit stop or a high quality transit corridor with a combined service interval frequency of 15 minutes or less during the AM and PM peak hours;
- Local-serving retail if a single store is less than 50,000 square feet or project is a local-serving project as determined by the City;
- Affordable housing projects that provide a high percentage of affordable housing as determined by the City;
- Local essential service, including day care center, public K-12 schools, police or fire facility, medical/dental office building, government offices, and supportive housing types (assisted living, permanent supportive housing, memory care, etc.);
- Map based screening; and
- Redevelopment projects that do not result in a net increase in VMT (SOURCE V.2d).

Impact Analysis. City staff reviewed the project in accordance with the City's adopted guidelines. The proposed project meets the screening criteria because it is located in a VMT Efficient Area based on the Santa Cruz County Residential Screening Map, and, therefore,

the project is located in an area that produces VMT per capita that is at least 15-percent below the Countywide average.

In addition, the project is within a ½ mile of an existing major transit stop a bus line, located on Mission Street, with service interval frequency of 15 minutes or less during both morning and afternoon peak periods. Under existing conditions, transit service on Mission Street is provided by Santa Cruz METRO with Route 18. The service internal frequency during morning and afternoon peak periods is 15 minutes for this route. According to State VMT guidelines, projects would not qualify for this screening threshold if they include more parking for use by residential, customers, or employees than required by the jurisdiction. The proposed project would provide 119 parking spaces, which is less than the City's code requirement of 177 parking spaces. This amount of proposed parking spaces is allowed by AB 2097 which prohibits public agencies from imposing parking minimums within ½ mile of major transit stops. For these reasons, the project qualifies as a 'Project Near High Quality Transit' and would not result in a significant impact related to VMT based on the City's adopted threshold and guidelines.

As a result of the above, according to the City's guidelines, the project would not result in a significant impact related to VMT based on the City's adopted threshold and guidelines and is screened out from further VMT impact review. Therefore, the project would result in a *less-than-significant impact* related to VMT and would not conflict or be inconsistent with CEQA Guidelines section 15064.3.

(c, d) Design-Safety and Emergency Access. The project has been designed in accordance with standard City requirements, and there are no access designs that would substantially increase hazards. The project would provide three vehicular access points: two from Swift Street to the east and one from Delaware Avenue, through an adjacent property and new easement to the north. Entry to the project site would be controlled through automatic sliding vehicular gates. Each entry point would accommodate inbound and outbound vehicles. Turnaround areas for emergency vehicles are proposed at the northwestern and southeastern portions of the project site. The project was reviewed by the City's transportation engineering staff of the Public Works Department. Furthermore, the project would be designed in accordance with City police and fire department requirements and would provide for adequate emergency access. For these reasons, the project would not result in increased hazards related to project design, would not provide inadequate emergency access, and would result in *no impact* related to project design that could result in substantial increases in hazards.

18. Tribal Cultural Resources

(a-b) Tribal Cultural Resources and Consultation. The California Public Resources Code section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." Assembly Bill (AB) 52 requires that California lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if so requested by the tribe. AB 52 also specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural

resource (TCR) is a project that may have a significant effect on the environment. Defined in Section 21074(a) of the Public Resources Code, a TCR is a site feature, place, cultural landscape, sacred place, or object, which is of cultural value to a California Native American tribe and is either listed in or eligible for listing in the California Register of Historical Resources or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a TCR.

The City of Santa Cruz received formal requests for notification on proposed projects pursuant to Public Resources Code (PRC) section 21080.3.1 from two Native American tribes traditionally and culturally affiliated with the City. The City received the requests from the Amah Mutsun Tribe in April 2022 and from the Costanoan Rumsen Carmel Tribe in May 2024. Both of these tribes requested notification of development projects within the City pursuant to AB 52 requirements codified in Public Resources Code section 21080.3.1.

Pursuant to PRC section 21080.3.1, the City provided notification of the Project to the Amah Mutsun Tribal Band and the Costanoan Rumsen Carmel Tribe on November 8, 2024 (email) and on November 11, 2024 (mailed letters), which was within 14 days of determining the Project application was complete. No Native American tribe has contacted the City of Santa Cruz and requested consultation. As described in Section VI.6 above, an archaeological investigation of the site was conducted and the project would not result in impacts to known resources. Although the project is located within an area considered to have low potential for archaeological sensitivity or archaeological resources, there is the potential for the discovery of unknown pre-contact archaeological resources or historic archaeological resources during soil-disturbing construction. While no known TCRs are located on the project site, it is possible that ground-disturbing activities would have the potential to encounter unknown subsurface resources, the discovery of which would be subject to procedures outlined in City regulations as described in section VI.6. Therefore, the proposed project would result in *no impact* to tribal cultural resources.

19. Utilities and Service Systems

(a) Relocation or Construction of Utilities. The project would be served by existing utilities. The project would not require the relocation or construction of new utilities, other than extension of utility lines to serve the project, and, there would be *no impact*.

(b) Water Supply. The project site is located within the service area of the City of Santa Cruz Water Department, which serves an approximate 20-square-mile area. The service area includes the entire City of Santa Cruz, adjoining unincorporated areas of Santa Cruz County, a small part of the City of Capitola, the University of California at Santa Cruz campus that is within City limits and coastal agricultural lands north of the City. Water is treated at the City's Graham Hill Water Treatment Plant (GHWTP), except for groundwater, which is treated as part of the Beltz well system.

Water Supplies. The City's water system relies predominantly on local surface water supplies, which include the North Coast sources (Liddell Spring and Laguna, Majors, and Reggiardo Creeks), the San Lorenzo River (Felton Diversion, Tait Diversion, and Tait Wells), and Loch Lomond Reservoir. Together, these surface water sources represent approximately 95% of the

City's total annual water production. The balance of the City's supply comes from groundwater, all of which is extracted from the Beltz Well system the Santa Cruz in the Santa Cruz Mid-County Groundwater Basin (SOURCE V.2e). During the past ten years, the North Coast sources represented 20 percent of the total water supply, the San Lorenzo River represented 58 percent, Loch Lomond Reservoir (Newell Creek) represented 16 percent, and Beltz Well system contributed the remaining 6 percent. (SOURCE V.2b).

Water Supply Augmentation Strategies. Since 2015, the City of Santa Cruz has been pursuing its Water Supply Augmentation Strategy (WSAS) developed by the Water Supply Advisory Committee (WSAC) as described in the 2020 UWMP. The overarching goal of the WSAS is to provide significant improvement in the sufficiency and reliability of the City water supply. The WSAS portfolio elements include the following:

- Element 0: Demand Management. Additional water conservation with a goal of achieving an additional 200 to 250 MGY of demand reduction by 2035 by expanding water conservation programs.
- Element 1: Transfers and Exchanges. Passive recharge of regional aquifers by working to develop agreements for delivering surface water to the Soquel Creek Water District and/or the Scotts Valley Water District so they can rest their groundwater wells, help the aquifers recover, and potentially store water for use by the City in dry periods.
- Element 2: Aquifer Storage and Recovery (ASR). Active recharge of regional aquifers by using existing infrastructure and potential new infrastructure in the Purisima aquifer in the Soquel-Aptos Basin (now referred to as the Santa Cruz Mid-County Groundwater Basin), in the Santa Margarita/Lompico/Butano aquifers (now referred to as the Santa Margarita Groundwater Basin) in the Scotts Valley area, or in both to store water that can be available for use by the City in dry periods.
- Element 3: Recycled Water or Desalination. A potable water supply using advanced-treated recycled water as its source as a supplemental or replacement supply in the event the groundwater storage strategies described in Element 1 and Element 2 prove insufficient to meet the goals of cost-effectiveness, timeliness, or yield. In the event advanced-treated recycled water does not meet the City's needs, desalination would become Element 3.

The Santa Cruz Water Department has been actively pursuing these recommendations since 2015 and continues to make steady progress. Additionally, in collaboration with the Soquel Creek Water District (District), the City is currently working on the Santa Cruz Mid-County Regional Water Resources Optimization Study. The primary purpose of the Optimization Study is for the District and City to collaboratively identify and evaluate potential opportunities to optimize select projects and management actions (PMA) identified in the Basin's Groundwater Sustainability Plan to most effectively achieve/maintain groundwater basin sustainability. Additionally, the Study is evaluating the PMAs for their ability to improve regional water supply reliability. Projects that are the focus of the Optimization Study include:

- Water transfers/exchanges between the District and the City
- City's ASR Project
- District's Pure Water Soquel Project (SOURCE V.2b).

In 2022, the Water Department worked extensively with the Water Commission to complete a comparison of the water supply augmentation strategies identified in the WSAS, to develop a water supply augmentation policy, *Securing Our Water Future (SOWF)*, since adopted by City Council, and to initiate the *Water Supply Augmentation Implementation Plan (WSAIP)* as part of the final phase of implementing the WSAS. The SOWF policy provides a comprehensive framework to guide selection and incremental implementation of necessary water supply augmentation projects. It defines how water supply projects will be selected and provides estimated high-level yield and costs associated with water supply augmentation projects. The policy direction includes a provision that the volume of water needed to meet the reliability goal be reviewed and potentially revised no less frequently than every five years based on ongoing research and monitoring of the impacts of climate change on local water conditions. This “adaptive management” approach is critically important to support appropriate timing of implementation of water supply augmentation projects (SOURCE V.2b).

The City also has embarked on an ambitious capital investment program, the *Santa Cruz Water Program*, to secure the City’s future water supply portfolio, to improve reliability and resiliency in the face of climate change, and to address aged infrastructure. Major investments are planned in the coming years to meet these goals. Some elements of the program will help contribute to the WSAS and support water supply reliability such as improvements to the *Graham Hill Water Treatment Plant*, raw water pipeline improvements, and *Tait diversion* as reported in a recent City evaluation (SOURCE V.2b).

Existing and Future Water Demand. The City’s 2020 UWMP reports that until the early 2000s, the general trend in the City of Santa Cruz water system use was one in which water use rose roughly in parallel with account and population growth over time, except during two major drought periods in the late 1970s and the early 1990s. Around 2000, this pattern changed and system demand began a long period of decline, accelerated by rate increases, drought, economic downturn, and other factors.

In 2015, after two years of water rationing, annual water use fell to a level of about 2.5 billion gallons, similar to the level experienced during the 1970s drought. In 2023, demand was still at a similar level as 2015, about 2.5 billion gallons, despite several years of above long-term average rainfall from 2016 and 2023. While demand did rebound following droughts in the 1970s and 1980s, demand has not rebounded to pre-drought conditions following 2014, contrary to previous projections. Today, even with 30 percent population growth since the 1980s, the City is using less water than in the 1980s due to conservation efforts including plumbing code changes and water efficient appliances and landscapes. In 2023, water demand in the service area was slightly below 2,500 MGY (SOURCE V.2b).

In September 2024, the Water Department updated its demand projections to reflect known cumulative development projects and anticipated growth within the Water Department’s service area, including the proposed Project. The results indicate that demand could reach 2,800 MGY by the year 2035 and reach approximately 3,000 MGY year by 2045, which is about 8.6 percent higher than forecast in the 2020 UWMP due to higher projected levels of housing development, particularly with respect to multi-family and accessory dwelling unit (ADU)

residential development. For reference, the estimated projected demand in 2045, 3,000 MGY, is approximately equal to the City's water use in 1968 (SOURCE V.2b).

Water Supply Availability. The water supply reliability and drought risk assessments included in 2020 UWMP found water supply to be adequate in normal and single dry years, but show a potential lack of adequate supplies during near-term multiple consecutive dry years. Santa Cruz has had periodic water shortages for the last several decades, driven by droughts. Yet, even with 30 percent population growth since the 1980s, the City is using less water now as it was then (SOURCE V.2b).

The City's supply problem has been caused by cyclical shortfalls in rain, exacerbated by a long-term lack of ability to capture and store rainfall – features of the emerging climate change phenomenon of “weather whiplash” that results in so-called “normal” rainfall years becoming a thing of the past. Because of climate change, the City's water supply problem must be solved regardless of whether or not the City grows. To address supply vulnerability, the City is implementing its WSAS developed and recommended by the WSAC, in addition to ongoing water conservation, including the development of ASR facilities, transfers and/or exchanges with neighboring water districts, and increased use of recycled water (SOURCE V.2b).

The City updated its water supply analysis with the updated 2024 demand projections. The data, methods, and basis for assumed water shortage conditions are consistent with those in the City's 2020 UWMP (SOURCE V.2b). The City utilized the Confluence® model to analyze the variability of water supplies to determine potential water supply shortages, which the City has used to support water supply planning activities since 2003; this model was also used to generate the results for the 2010, 2015, and 2020 UWMP. The model accounts for the variation in demand both within and between years, the availability of water from various sources, and the capacity of infrastructure to pump and treat the water. The City is in the process of transitioning to a new water system model developed by University of Massachusetts' Hydrosystem Research Group. Before the Confluence® model was retired from use by the City, model runs for the current scenario were completed under projected demands of up to 2,900 MGY which form the basis for this analysis (SOURCE V.2b).

The City is safeguarding against future water shortages by actively implementing future water projects as described above. Consistent with the WSAS and 2020 UWMP, the following assumptions about future water projects were used in the updated water supply analysis:

- In 2025, the City will have implemented proposed water rights modifications, including implementation of the Agreed Flows which are protective of local anadromous fisheries, as described in the Santa Cruz Water Rights Project Final EIR
- In 2030, the City will have implemented the following components of the WSAS and planned infrastructure projects:
 - ASR in the Santa Cruz Mid-County Groundwater Basin and/or the Santa Margarita Groundwater Basin, sized for up to 4.5 million gallons per day (MGD) injection and 8.0 MGD extraction as described in the Santa Cruz Water Rights Project Final EIR,
 - Improvements to the Tait Diversion on the San Lorenzo River as described in the Santa Cruz Water Rights Project Final EIR and as included in the Santa Cruz Water Program,

- Facility improvements at the Graham Hill Water Treatment Plan that will allow treatment of more turbid water as included in the Santa Cruz Water Program, and
- Replacement of major transmission pipelines on the North Coast and the NCP as included in the Santa Cruz Water Program.

Water supply was modeled for an average/normal year, single dry year and a consecutive five-year dry period over a 20-year period. The results indicate that in the near term (2025) with proposed water rights modifications assumed but before implementation of ASR and planned infrastructure projects, City projects having sufficient water supply available in normal years and single dry years. Under near-term multi-year drought conditions, with proposed water rights modifications assumed but before implementation of the ASR and planned infrastructure projects, available supplies would meet projected demand in years one through three of the multi-year drought scenario, but would fall short of demand by four percent in year four, and 23 percent in year five (SOURCE V.2b).

In the 2030 – 2040 analysis period, assuming implementation of the City's proposed water rights modifications, ASR and planned infrastructure improvements, the City projects having sufficient water supply available in normal years, single dry years, and multiple dry years to serve anticipated demand (SOURCE V.2b).

In 2045, the analysis shows a three percent deficit across all year types. A three percent shortage is considered a negligible amount in the scale of this twenty-year supply and demand analysis. Furthermore, although the demand projected for 2045 is 3,000 MG, the maximum demand modeled in the Confluence® model before it was retired from use by the City was 2,900 MG. While this results in an apparent three percent shortage in all 2045 year-type scenarios, it is anticipated that the modeled shortages would have been smaller or absent if Confluence® model runs had been completed using 3,000 MG as the maximum demand. That is, if the model had been instructed to keep supplying water up to 3,000 MG, rather than stopping when the modeled demand of 2,900 MG was satisfied, the system would likely have had additional water available which the model did not supply since the set demand of 2,900 MG was already met. Moreover, implementation of the City's SOWF Policy and its adaptive management approach would ensure that future water supply projects would be fine-tuned to eliminate any minor projected future shortages (SOURCE V.2b).

The City also modeled water supply under a climate change scenario, which indicated that in the near term (2025) in this climate change scenario with proposed water rights modifications but before implementation of ASR and planned infrastructure projects, the City projects having sufficient water supplies available in normal years. In a near-term single dry year in this climate scenario, a four percent shortage would result. In the multi-year drought scenario, available supplies would meet projected demand in years one through three, but would fall short of demand by 19 percent in year four and 15 percent in year five (SOURCE V.2b).

In the 2030 – 2040 analysis period, with implementation of ASR and planned infrastructure projects, available supplies would meet projected demand in normal and single dry years. In the multi-year drought scenario, available supplies would meet projected demand in years one

through four of the multi-year drought scenario, but would fall short of demand in year five by four percent (2030, 2035) to seven percent (2040) (SOURCE V.2b).

In 2045, the analysis shows a three percent deficit across a normal year, single dry year, and years one through four of the multi-year dry sequence, increasing to ten percent in year five. Although the demand projected for 2045 is 3,000 MG, the maximum demand modeled in the Confluence® model before it was retired from use by the City was 2,900 MG. While this results in an apparent three to ten percent shortage in the 2045 scenarios, it is anticipated that the modeled shortages would have been smaller or absent if Confluence® model runs had been completed using 3,000 MG as the maximum demand. That is, if the model had been instructed to keep supplying water up to 3,000 MG, rather than stopping when the modeled demand of 2,900 MG was satisfied, the system would likely have had additional water available which the model did not supply since the set demand of 2,900 MG was already met (SOURCE V.2b).

While a shortage is projected under these scenarios with implementation of the ASR and planned infrastructure projects, the City is currently planning for water supply augmentation through its SOWF Policy and WSAIP that would meet projected supply under plausible worst-case conditions. Moreover, implementation of the adaptive management approach from SOWF Policy would ensure that future water supply projects would be fine-tuned to eliminate any projected future shortages (SOURCE V.2b).

The SOWF was structured to incorporate changing demands and climate projections over time and includes a reliability goal based on adequate supply to meet all customer demand. As noted in the SOWF, expected increases in demand in the water service area are not expected to drive the size or timing of needed water supply augmentation projects. Longer dry periods under climate change conditions are understood to be the primary challenge driving the need to augment the City's water supply (SOURCE V.2b).

Impact Analysis. The proposed project would result in increased potable water demand, which would not be substantial and could be served by existing City water supplies, which would be adequate to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, the impact is *less than significant*.

The proposed project would result in development of 100 new multi-family residential units that could result in a water demand of approximately 3.2 MGY based on multi-family residential (MFR) water demand rates used in the 2020 UWMP. The project water demand represents a negligible amount (approximately 0.01 percent) of the total existing and 2,800 MGY of future water demand projected for the year 2030 with the 2024 demand projections.

The proposed project and other development projects that are under construction, approved, or have pending development applications were considered in the 2024 water demand projections and updated water supply evaluation. Thus, the Project and other foreseeable development water demand is within the water demand accounted for in this update.

As indicated above, the 2024 updated water demand projections and water supply evaluation indicate that in the near term (2025), the City projects having sufficient water supply available in normal years and single dry years. Under near-term multi-year drought conditions, available supplies would meet projected demand in years one through three of the multi-year drought scenario but would fall short of demand by four percent in year four, and 23 percent in year five. In the 2030-2040 analysis period, the City would have sufficient water supply available in normal years, single dry years, and multiple dry years to serve anticipated demand. In 2045, the analysis shows a negligible three percent deficit across all year types (SOURCE V.2b).

Under the climate change scenario in the near term (2025), the City projects having sufficient water supplies available in normal years. In a near-term single dry year in the climate scenario, a four percent shortage would result. In the multi-year drought scenario, available supplies would meet projected demand in years one through three, but would fall short of demand by 19 percent in year four and 15 percent in year five (SOURCE V.2b).

Under the climate change scenario in the 2030-2040 analysis period, available supplies would meet projected demand in normal and single dry years. In the multi-year drought scenario, available supplies would meet projected demand in years one through four of the multi-year drought scenario, but would fall short of demand in year five by four percent (2030, 2035) to seven percent (2040). Under the climate change scenario in 2045, the analysis shows a three percent deficit across a normal year, single dry year, and years one through four of the multi-year dry sequence, increasing to ten percent in year five. Although the demand projected for 2045 is 3,000 MG, the maximum demand modeled in the Confluence® model before it was retired from use by the City was 2,900 MG. While this results in an apparent three to ten percent shortage in the 2045 scenarios, it is anticipated that the modeled shortages would have been smaller or absent if Confluence® model runs had been completed using 3,000 MG as the maximum demand (SOURCE V.2b).

In the near-term, the projected shortfall would require aggressive reduction savings according to the City's Water Shortage Contingency Plan (2021a). As required by California Water Code and to manage risks due to water supply shortages that can be expected in the future, the 2020 UWMP includes a Water Shortage Contingency Plan that addresses how the City's water system would be managed during a water shortage emergency that arises as a result of drought, which could result in required customer water use reductions when shortfalls occur. With implementation of planned water augmentation projects and strategies and after the year 2030, potential shortfalls are projected to be a negligible four percent (SOURCE V.2b).

During periods of dry years and drought, water customers could be subject to water curtailment as enacted by the City. A multiple-dry year scenario could require substantial curtailment by all water customers until a number of planned water supply projects and strategies are expected to be implemented by 2030. The Project is expected to be constructed and occupied in 2028, which would be within the period of projected near-term water shortages during the fifth year of a drought. However, the Project's estimated water demand is very minimal compared to the total projected water demand in 2030

(approximately 0.04 percent of the total demand). If a shortage and subsequent curtailment were to occur, the Project's demand when spread out among all users would not be a substantial increase as to cause further curtailment than would already be required throughout the service area. Therefore, the impact of increased water demand on water supplies due to the Project is considered less than significant as there are sufficient supplies from existing sources to serve the project during normal and single-year dry periods, and the Project's minimal demand during multiple-year droughts would not be substantial in comparison to total demand (SOURCE V.2b).

Project users would be required to comply with required curtailment orders if imposed as would all of the service area customers. In addition, the Project would be subject to City development standards and requirements that include requirements for installation of water conservation fixtures and landscaping for new construction. In addition, the project would pay the required "System Development Charge" for the required new service connection. This charge as set forth in Chapter 16.14 of the City's Municipal Code is intended to mitigate the water supply impacts caused by new development in the City of Santa Cruz water service area, and the funds are used for construction of public water system improvements and conservation programs.

The City also considered availability of water supplies to serve the project and other "reasonably foreseeable future development," which the City determined to be projects that are under construction or have been approved. The 2024 updated water demand projections and water supply analysis considered all cumulative development projects, including pending permit applications as well as approved projects and projects under construction. Thus, based on results of the 2024 demand projections and analysis explained above, the demand from the Project and reasonably foreseeable development would not result in more stringent contingency measures than already anticipated for a multiple dry year period.

Therefore, water supplies with implementation of planned augmentation projects are sufficient to serve the project and reasonably foreseeable development, and the impact regarding water supply availability is *less-than-significant*.

(c) Wastewater Treatment Capacity. The project would be served by the City's wastewater treatment facility. The proposed project would result in an increase in wastewater flows of approximately 0.006 million gallons per day based on average water use. This would not be considered substantial in that the City's existing remaining wastewater treatment capacity available to the City's service area is approximately 4.0 million gallons per day, which is more than adequate to serve the project. Thus, increased wastewater generated by the project would result in a *less-than-significant impact* on wastewater treatment capacity.

(d-e) Solid Waste Disposal. Solid waste collection and disposal services, including recycling services, are provided to City residents, businesses, and institutions within the City's boundaries by the City of Santa Cruz. The City's Resource Recovery Facility (RRF) is located approximately 3 miles west of the City off Highway 1 at 605 Dimeo Lane. The site covers 100 acres with 67 acres available for disposal use. 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.

The RRF is permitted to receive a total of 10,484,325 cubic yards (cy) of solid waste, including wood waste, tires, sludge (biosolids), mixed municipal wastes, metals, inert wastes, industrial wastes, green materials, dead animals, and construction/demolition wastes. As of July 31, 2021, the landfill had a remaining capacity of approximately 5.3 million cy (approximately 51%) and is anticipated to reach maximum final capacity in the year 2054. In 2023, 65,687 tons of solid waste were disposed of at the RRF, which is an average of approximately 180 tons per day (approximately 34% of daily capacity) (SOURCE V.2a).

Impact Analysis. The proposed project would result in development of 100 residential units. based on estimated solid waste generation rates provided by CalRecycle of 3.6 pounds per unit per day to 8.6 pounds per multi-family residential unit per day (SOURCE V.2a), the proposed project could generate approximately 360-860 pounds of waste per day or less than one ton per day. the City's RRF has a remaining capacity of approximately 51% or approximately 5.3 million cy of solid waste. Daily throughput in 2023 averaged 34% of the RRF's permitted daily capacity of 535 tons (SOURCE V.2a). Thus, adequate landfill capacity is available during the timeframe of the proposed project and beyond to serve development accommodated by the project. Given this, the City's RRF would have adequate capacity to accommodate the net increase in solid waste generated by the project, and the impact would be *less-than-significant*.

20. Wildfire

(a) Emergency Plans. Existing and proposed access to the project site is from Swift Street. The project includes construction of 100 new residential apartment units and a new driveway for access to the project site but would not include any changes to existing public roadways that provide emergency access to the site. Therefore, the project would not substantially impair an adopted emergency response or evacuation plan and would result in *no impact*.

(b, d) Exacerbate Wildfire Impacts. The project site is not located in or near a state responsibility area nor a high fire hazard area as identified in the City's *General Plan 2030* (SOURCE V.1b-DEIR Figure 4.6-1). The project site is located in a developed urban area and would not significantly increase exposure to wildland fire hazards or exacerbate wildfire risks as the site is not located adjacent to or in proximity to a wildfire hazard area. Therefore, the project would result in *no impact*.

(c) Installation of Infrastructure. Infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities may exacerbate fire risk or may result in temporary or ongoing impacts to the environment. The project would not require installation of infrastructure that would exacerbate fire risks. Utility connections to the project site would be underground within an existing developed urban area. Therefore, the project would not expose people or structures to a significant risk related to wildfires, and there would be *no impact*. See also section VI.9(g) above.

21. Mandatory Findings of Significance

(a) Quality of the Environment. The proposed project would have no significant effect on cultural resources or result in elimination of important examples of major period of California history or prehistory with implementation of mitigation measures. The project would not result in impacts to biological resources with imposition of the City's standard conditions of approval for pre-construction nesting bird surveys. The project would not degrade the quality of the environmental or otherwise substantially adversely affect fish and wildlife habitats or threaten to eliminate a plant or animal community.

(b) Cumulative Impacts. Cumulative development with the proposed project would result in a net increase of approximately 3,630 new residential units, including the proposed project, a net decrease of approximately 40,000 square feet of commercial uses, a net increase of approximately 46,500 square feet of industrial uses, a decrease in office space and an increase of approximately 400 hotel rooms based on a cumulative analysis included in an EIR for another proposed residential project within the City (SOURCE V.2a). The analysis identified a potentially significant cumulative impact regarding water supply, but no other significant cumulative impacts to which the proposed project would contribute were identified (SOURCE V.2a).

Cumulative development, including the proposed project, was included in the 2024 updated water demand projections, which also included updated projections within the City's water service area. Total water demand within the City's water service area would increase from a current demand of approximately 2,600 MGY to a forecasted demand of 3,000 MGY in 2045 based on the 2024 updated demand projections. Without augmented water supplies, cumulative development and associated water demand during dry periods would result in a potentially significant cumulative impact on water supplies. Water demand resulting from cumulative development projects, would lead to potential near-term shortfalls (2025-2030) depending on the level of development construction, and also negligible shortfalls (approximately four percent) in the fifth year of a multi-year drought under climate change forecasts to the year 2040 and in normal, single dry year and multiple dry years by the year 2045, with a slightly higher shortfall in the fifth year of a multi-year drought. This is considered a significant cumulative impact without implementation of the City's water supply augmentation projects and strategies. The City is currently planning for water supply augmentation through its SOWF Policy and Water Supply Augmentation Implementation Plan, which the City anticipates would meet projected supply under worst-case conditions (SOURCE V.2b). Furthermore, projected increases in water demand within the service area are not expected to drive the size or timing of needed water supply augmentation projects. Longer dry periods under the climate change scenario is the primary factor driving the need to augment the City's water supply (SOURCE V.2b).

The proposed project would contribute to significant cumulative impacts related to water supply availability. However, the project would be subject to City requirements for installation of water-conserving fixtures and landscaping in accordance with current Municipal Code and building requirements. Under multi-year drought conditions, the Project, like other City customers, could be subject to water use restrictions. The increase in water demand due to the Project would not substantially exacerbate water supply reliability in the future or during a

drought because the amount of additional demand when spread across all service area customers would not result in any noticeable increase in the timing or extent of curtailment in customer use that would otherwise be implemented during drought conditions.

In addition, the Project would pay the required “System Development Charge” that is required for a new or upgraded service connection or where a project adds new residential uses. This charge, as set forth in Chapter 16.14 of the Municipal Code, funds public water system improvements, and is assessed so projects pay the proportional share of the costs of new and existing water facilities necessary to meet the demand resulting from new or enlarged water services. This charge is intended to mitigate the water supply impacts caused by new development in the City’s water service area, and the funds are used for construction of public water system improvements and conservation programs. Payment of the System Development Charge and implementation of other water conservation measures would mitigate the Project’s contribution to cumulative water supply impacts. Therefore, the project’s incremental contribution to a significant cumulative water supply impact would not be cumulatively considerable.

(c) Substantial Adverse Effects on Human Beings. No environmental effects have been identified that would have direct or indirect adverse effects on human beings.

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