CITY OF SANTA CRUZ

Mitigated Negative Declaration

The Administrator of Environmental Quality of the City of Santa Cruz has prepared this Mitigated Negative Declaration for the following described project:

Project: 810 3rd Street Site Improvements **Application No.:** CP24-0130

Project Location: 810 3rd Street (APN 007-033-05) in the City of Santa Cruz

Project Description: The project consists of a Coastal Permit, Administrative Use Permit, and Design Permit to modify an existing parking lot to provide a total of 25 parking spaces, to construct a laundry room addition, conduct utility trenching, and to install a fence on a property with an existing motel use within the boundaries of the Beach South of Laurel Area Plan. The site contains known archaeological resources.

Applicant: Christian Nielsen

Applicant Address: 1509 Seabright Avenue, Santa Cruz, CA 95062

The City of Santa Cruz Community Development Department has reviewed the proposed project and has determined that the project, based on the Initial Study attached hereto, will not have a significant effect on the environment. An Environmental Impact Report is not required pursuant to the California Environmental Quality Act of 1970. This environmental review process and (Mitigated) Negative Declaration is done in accordance with the State CEQA Guidelines and the local City of Santa Cruz CEQA Guidelines and Procedures.

The following mitigation measures will be incorporated into the project design or as conditions of approval, to ensure that any potential environmental impacts will not be significant.

Impact	Mitigation
Ground-disturbing activities associated with the project very likely to encounter historically significant archaeological materials and could result in potentially significant impacts to the archaeological or historical resources and potential human remains.	**MITIGATION MEASURE CULT-1:** Implement all measures in the applicant-proposed Memorandum of Agreement between the Santa Cruz Seaside Company and the AMTB as set forth in the signed document, dated February 10, 2026 and March 6, 2026, respectively for the two signatories. **MITIGATION MEASURE CULT-2:** Require an archaeologist and Native American to monitor construction within the project area to include cultural sensitivity training for construction workers and archaeological and tribal monitoring during ground disturbing construction.

Lee Butler
Administrator of Environmental Quality
City of Santa Cruz, California

7/22/26
Date

City of Santa Cruz
ENVIRONMENTAL CHECKLIST FORM / INITIAL STUDY

I. Background

1. **Application No:** CP24-0130

2. **Project Title:** 810 3rd Street Site Improvements

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:**
   Rina Zhou, Senior Planner
   City of Santa Cruz Community Development Department
   (831) 420-5104 | rzhou@santacruzca.gov

5. **Project Location:** 810 3rd Street (APN 007-033-05) in the City of Santa Cruz; see Figure 1.

6. **Project Applicant's/Sponsor's Name and Address:**
   Christian Nielsen
   1509 Seabright Avenue
   Santa Cruz, ca 95062

7. **General Plan Designation:** Medium Density Residential

8. **Zoning:** R-T(B)/CZ-O (Motel Residential Subdistrict B/Coastal Zone Overlay)

9. **Description of the Project:** The project consists of a Coastal Permit, Administrative Use Permit, and Design Permit to modify an existing parking lot to provide a total of 25 parking spaces, to construct a laundry room addition, conduct utility trenching, and to install a fence on a property with an existing motel use within the boundaries of the Beach South of Laurel Area Plan. This site contains known archaeological resources.

   The project consists of minor improvements at an existing motel, primarily to renovate the existing parking lot and to construct a new laundry room. The proposed 417-square-foot laundry room would be located on the first floor between three existing onsite buildings on the western side of the property.

   The existing 22-space parking lot would be slightly expanded to provide 25 parking spaces for the existing 21-room motel. The area of expansion is the site of a former swimming pool. The new area would be paved, the existing parking lot would be repaved, and the entire lot would be restriped to provide the new parking spaces. As part of the parking lot renovation, the curb around an existing landscaped island within the parking lot would be demolished and the area

of landscaping would be expanded by approximately 1,784 square feet adjacent to the parking lot. A portion of an existing retaining wall at the rear of the property would be removed. A new wood fence would be installed at the edge of the parking lot, and a new pedestrian path between rooms and parking lot would be installed. The project site plan is shown on Figure 2. The project site would continue to be accessed from Third Street via an existing driveway.

Utilities. The project would be served by existing public utilities; site improvements include new and modified on-site utility connections that consist of underground dry and wet utility lines, a new Pacific Gas & Electric (PG&E) transformer pad, and a main service board (MSB) pad to support electrical service. Electrical and gas service would continue to be provided by PG&E. A stormwater biofiltration area and associated drainage infrastructure would be installed.

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

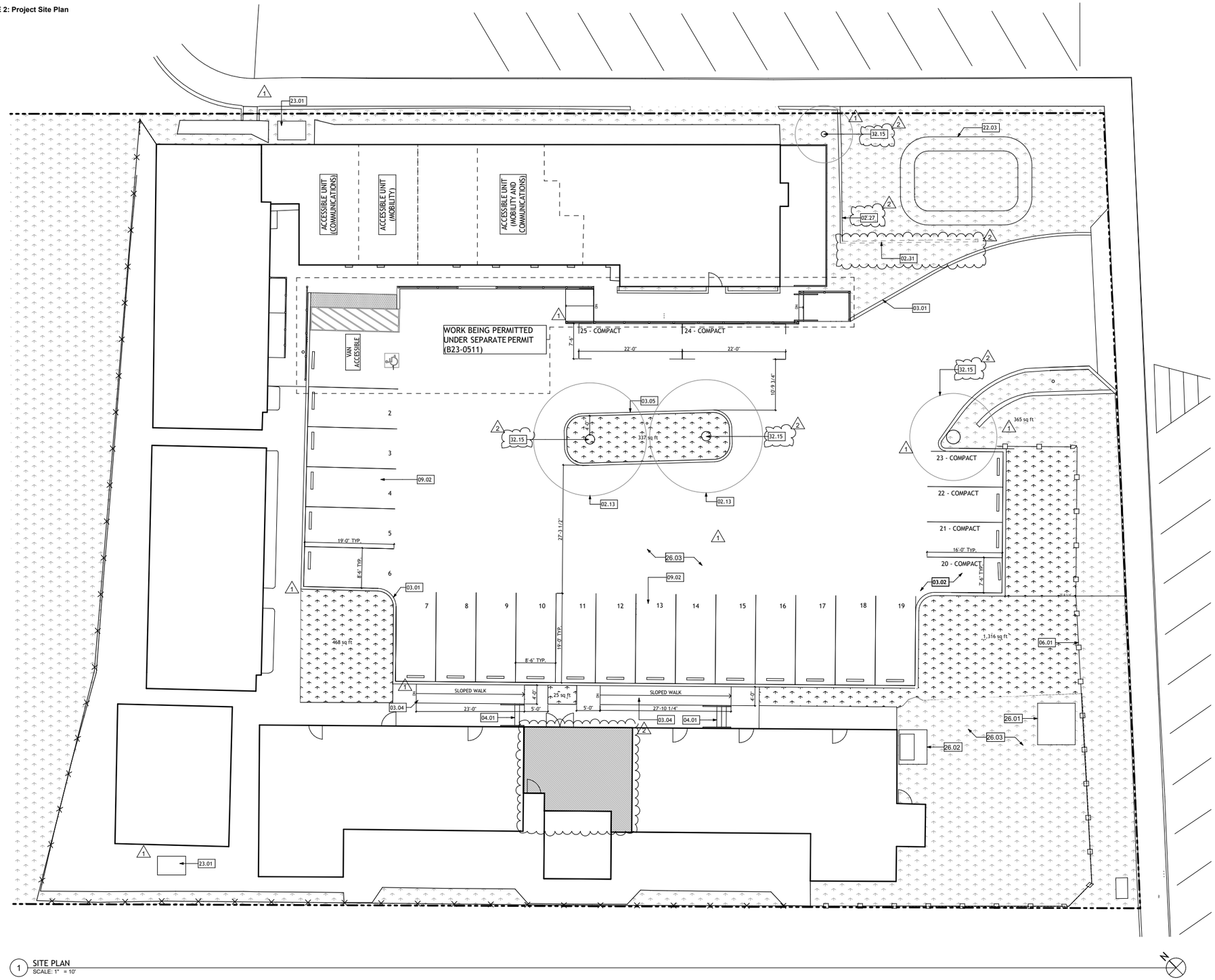
The approximate 1.1-acre project property is located on the north side of 3rd Street, between Cliff Street to the east and Younger Way to the west in the Beach Area neighborhood of the City of Santa Cruz, as defined by the City's General Plan (SOURCE V1.a). The site is bordered by 3rd Street on the south, Cliff Street on the east, residential uses at the base of an existing bluff on the north, and residential uses on the west. The project site is located within a developed neighborhood that has a mix of single-family homes, multi-family dwellings, and visitor-serving motels and hotels. The Santa Cruz Beach Boardwalk and Monterey Bay are located approximately 0.2 miles south of the project site. The San Lorenzo River is located northeast of the project site.

The project site sits at an elevation approximately 80 feet above mean sea level in a neighborhood known as Beach Hill. The site is located at the northern side of a coastal terrace. The bluff along the north side of the property slopes at about 60 percent to an adjacent property about 50 feet below the project site at the base of the bluff, and the slope is vegetated. The site is developed with an existing two-story motel and associated parking and landscaping. The existing motel has 21 rooms and one manager's unit.

FIGURE 1: Vicinity Location



FIGURE 2: Project Site Plan



1 SITE PLAN
SCALE: 1" = 10'

SITE PLAN KEYNOTES

02.13	(E) TREE TO REMAIN
02.27	(E) RETAINING WALL TO REMAIN
02.31	PORTION OF (E) RETAINING WALL TO BE REMOVED. REFER TO CIVIL DRAWINGS FOR PROPOSED GRADING TO AVOID CONSTRUCTION OF NEW WALL
03.01	(N) CURB. SEE CIVIL DRAWINGS
03.02	(N) PAVEMENT AND PARKING SPACES ABOVE INFILLED POOL. SEE CIVIL DRAWINGS. POOL INFILL BEING PERMITTED UNDER SEPARATE PERMIT
03.04	(N) SLOPED WALKWAY.SEE CIVIL DRAWINGS
03.05	(N) CONC. PLANTER
04.01	(N) CONC. STAIRS AND HANDRAILS. SEE DETAILS ON SHEET A5.1
06.01	(N) WOOD FENCE. HEIGHT: 3'-6"
09.02	RESTRIPED PARKING SPACES, SEE CIVIL DRAWINGS
22.03	(N) BIOFILTRATION AREA, SEE CIVIL DRAWINGS
23.01	(N) 4'X6' HVAC CONC. PAD TO BE INSTALLED ABOVE GRADE. NO SOIL DISTURBANCE IS BEING PROPOSED FOR THE ADDITION OF THESE PADS.
26.01	(N) PG&E TRANSFORMER PAD
26.02	(N) MSB & PAD
26.03	REFER TO CIVIL DRAWINGS FOR DRY AND WET UTILITY LINES
32.15	(E) HERITAGE TREE TO REMAIN

FLOOR PLAN LEGEND

- (E) BUILDING AREA
- (N) LAUNDRY ROOM
- PROPERTY LINE
- SETBACK LINE
- (E) FENCE
- (N) FENCE
- (E) LANDSCAPE AREA
- (N) LANDSCAPE AREA

GENERAL NOTES

1. ALL EXISTING CONDITIONS TO REMAIN U.N.O.
2. THE EROSION CONTROL PLANS IN THIS SET SHALL BE REVIEWED AND IMPLEMENTED BY THE CONTRACTOR PRIOR TO COMMENCEMENT OF WORK

PARKING NOTES

1. EXISTING NUMBER OF PARKING SPACES (PERMITTED UNDER PERMIT B23-0511): 22
2. PROPOSED NUMBER OF PARKING SPACES UNDER CURRENT PERMIT: 25

FIRE & LIFE SAFETY NOTES

1. PROVIDE MINIMUM 6" HIGH BUILDING ADDRESS NUMERALS IN A CONTRASTING COLOR, CLEARLY VISIBLE FROM THE STREET. PROVIDE SEPARATE UNIT IDENTIFICATION PER SANTA CRUZ MUNICIPAL CODE §18.24.060.
2. PROVIDE FIRE EXTINGUISHERS PER CFC AND CCR TITLE 19. VERIFY FINAL LOCATIONS WITH FIRE AUTHORITY HAVING JURISDICTION.
3. PROVIDE KNOX BOX WITH MASTER KEY ACCESS FOR COMMERCIAL SPACES, COMMON AREAS, AND ALL UTILITY ROOMS. VERIFY FINAL LOCATION WITH FIRE DEPARTMENT.
4. PROVIDE IDENTIFICATION SIGNAGE AT MAIN ELECTRICAL, GAS, AND WATER SHUT-OFFS, SPRINKLER RISER ROOM, FIRE ALARM CONTROL ROOM, AND ELEVATOR MACHINERY ROOM. PROVIDE MINIMUM 2" WHITE LETTERING ON RED BACKGROUND.

LANDSCAPE AREA CALCULATION

PARKING FACILITY AREA (PARKING SPACES, AISLES, ACCESS DRIVES, AND NEARBY LANDSCAPED AREAS)	14,676 SQ FT
PERMANENT LANDSCAPE AREA WITHIN PARKING FACILITY	2,511 SQ FT
PERCENTAGE OF THE PARKING FACILITY DEVOTED TO PERMANENT LANDSCAPING	17.1%

NIELSEN
PLAN > DESIGN > BUILD
1509 Seabright Ave. 2B • Santa Cruz • CA • 95062
info@nielsen.team (831) 621-3926

DISCRETIONARY REVIEW ONLY

JOB NAME: 810 THIRD ST.
CLIENT: SANTA CRUZ SAESIDE COMPANY
ADDRESS: 810 THIRD ST, SANTA CRUZ, CA 95060
APN: 007-033-05

THE ISSUANCE OF A BUILDING PERMIT OR THE APPROVAL OF PLANS CONSTRUED AS A GUARANTEE THAT ALL CODE REQUIREMENTS HAVE BEEN ESTABLISHED IN THIS DOCUMENT. THE GENERAL CONTRACTOR AND/OR OWNER OF THE PROJECT SHALL BE ULTIMATELY RESPONSIBLE FOR ENSURING THAT THE CONSTRUCTION OF THIS PROJECT COMPLIES WITH ALL REGULATIONS, LAWS AND CODE REQUIREMENTS.

← 1" ACTUAL →

IF THE ABOVE DIMENSION DOES NOT MEASURE ONE INCH (1") EXACTLY, THIS DRAWING WILL HAVE BEEN ENLARGED OR REDUCED, AFFECTING ALL LABELED SCALES.

	REVISIONS	DATE
1	PLAN CHECK	02/02/26
1	PLAN CHECK	XX/XX/XX

Date:	9/24/2024
Scale:	AS NOTED
Drawn:	RS
Checked:	CN
Job:	#23-22

DISCRETIONARY REVIEW

A0.1 SITE PLAN

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 significant.

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.

- Geology and Soils – Fault Rupture, Geologic Hazards, Erosion
- Hydrology and Water Quality – Groundwater
- Noise

The General Plan 2030 EIR is on file at the City's 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.santacruzca.gov/Government/City-Departments/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: 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, 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.	



Rina Zhou, Senior Planner

July 22, 2026
Date

V. References and Data Source List

City Plans and Studies

1. City of Santa Cruz General Plan and EIR.
    a. Adopted June 26, 2012. General Plan 2030. Available online at: https://www.santacruzca.gov/Government/City-Departments/Community-Development/Long-Range-Policy-Planning/General-Plan.
    b. April 2012. City of Santa Cruz General Plan 2030 Final EIR. [SCH#2009032007] Certified June 26, 2012. Includes Draft EIR document, dated September 2011. Available online at: https://www.santacruzca.gov/Government/City-Departments/Community-Development/Long-Range-Policy-Planning/General-Plan.
    c. July 2018. "Cultural Resources Background Report Update with Policies, Programs, and Maps, City of Santa Cruz, Santa Cruz County, California." Prepared by Dudek.
    d. Adopted December 12, 2023. City of Santa Cruz 2023-2031 Housing Element-Prohousing. Prepared by Kimley-Horn. Available online at: https://www.santacruzca.gov/Government/City-Departments/Community-Development/Long-Range-Policy-Planning/General-Plan.

2. Other City of Santa Cruz Adopted Plans and Studies.
    a. 2026. 2025 Urban Water Management Plan. Prepared by the City of Santa Cruz, Water Department. Adopted June 2026. Available online at: https://www.santacruzca.gov/files/assets/city/v/1/wt/documents/online-reports/2025-uwmp/new-folder/2025-uwmp_final-ada.pdf.
    b. 2025. Santa Cruz Downtown Plan Expansion Draft Subsequent EIR [SCH#: 2022090276]. Certified May 13, 2025. Includes Draft Eir document dated January 2025. Prepared by Kimley-Horn. Available online at: https://www.santacruzca.gov/Government/City-Departments/Community-Development/Current-Planning/Environmental-ReviewCEQA.
    c. 2022. City of Santa Cruz 2030 Climate Action Plan Update, Resilient Together. Adopted September 2022. Available online at: https://www.santacruzca.gov/Government/Climate-Initiatives/Sustainability/Climate-Action-Plan.
    d. Adopted June 14, 2022. SB 743 Implementation Guidelines, City of Santa Cruz. May 12, 2022.
    e. June 2020. Resolution of the City Council of the City of Santa Cruz Adopting the Use of Vehicle Miles Traveled as the New Transportation Measure of Environmental Impacts. June 9, 2020 with Draft SB 743 Implementation Guidelines (May 27, 2020).
    f. 2018. City of Santa Cruz Climate Adaptation Plan Update 2018-2023. Available online at: https://www.santacruzca.gov/Government/Climate-Initiatives/Resiliency/2025-2030-Local-Hazard-Mitigation-and-Climate-Adaptation-Plan.
    g. October 25, 1994 as amended. The City of Santa Cruz General Plan and Local Coastal Program 1990-2005. [Local Coastal Program portion] Available online at:

https://www.santacruzca.gov/Government/City-Departments/Community-Development/Long-Range-Policy-Planning/Local-Coastal-Program-LCP.

Other Agency Plans and Studies

3. AMBAG.
   a. Adopted June 15, 2022. "2022 Regional Growth Forecast."
   b. Adopted June 11, 2014. "2014 Regional Growth Forecast".

4. California Air Resources Board (CARB).
   a. 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. November 2022. Available online at: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf.
   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.

5. California Environmental Protection Agency (CalEPA). 2025. Cortese List Data Resources. Available online at https://calepa.ca.gov/SiteCleanup/CorteseList/.

6. California Department of Finance. 2026. May 2026. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2026." Accessed May 4, 2026: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2026/.

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   a. Adopted March 15, 2017. *2012-2015 Air Quality Management Plan.* Adopted March 15, 2017. Available online at: https://www.mbard.org/air-quality-plans#docaccess-b0e082046a01d722cbb1a51cc381a0e03c775a38034bf055dbc809cba36777a8.
   b. Revised February 2016, adopted April 1996. "Guidelines for Implementing the California Environmental Quality Act." Available online at: https://www.mbard.org/ceqa#docaccess-8d84f64a4f4c1c97f6d56dc8803ca4b0dd659335e2ada6eff00fa6973d5e75d7.
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8. Schoolworks, Inc. March 2024. 2024 Developer Fee Justification Study for the Santa Cruz School Districts. Available online at: https://www.sccs.net/developer-fees.

9. U.S. Energy Information Administration. 2024. "California State Energy Profile." Available online at: https://www.eia.gov/state/print.php?sid=CA.

Applicant Studies

10. Butano Geotechnical Engineering, Inc.
    a. 2026. Geotechnical Plan Review Parking Improvements 810 3rd Street Santa Cruz, California. June 2, 2026.

b. 2025. Geotechnical Plan Review Parking Improvements 810 3rd Street Santa Cruz, California. July 2025.
c. 2025. Addendum Recommendations Parking Improvements 810 3rd Street Santa Cruz, California. January 23, 2025.
d. 2024. Geotechnical Investigation Design Phase For Slope Stability Evaluation 810 3rd Street Santa Cruz, California. August 2024.

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    a. 2026. Archaeological Impact Assessment Santa Cruz Seaside Company's Beach Hill Inn Project 810 3rd Street, Santa Cruz, California (APN: 007-033-05). March 18, 2026
    b. 2025. Phase II Archaeological Testing Report for Property at 810 3rd Street, Santa Cruz, Santa Cruz County, California (APN: 007-033-05). July 28, 2025.
    c. 2025. Letter to City of Santa Cruz Public Works Department. June 25, 2025.
    d. 2025. Addendum (to Phase 1A Assessment). Undated.
    e. 2024. Phase 1A Archaeological Assessment of Property at 810 3rd Street, Santa Cruz, Santa Cruz County, California (APN: 007-033-05). September 24, 2024.

13. Santa Cruz Seaside Company.
    a. 2026. Letter to Community Development Department regarding 810 Third St., Santa Cruz, California 95060 Acknowledgment of Geotechnical Recommendations. May 7, 2026.
    b. Santa Cruz Seaside Company and Amah Mutsun Tribal Band. 2026. Memorandum of Agreement between the Santa Cruz Seaside Company and the Amah Mutsun Tribal Band concerning the 810 3rd Street Property. March 3, 2026.

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Initial Study Preparation: City of Santa Cruz 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 Beach Hill neighborhood of Santa Cruz in an area characterized by a mix of residential and visitor-serving uses along 3rd Street. 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 views are located at the end of the Santa Cruz Wharf, approximately 0.2 miles southwest of the project site. However, the project site is not visible from this viewpoint due to intervening topography and development. "Urban views" are mapped along the San Lorenzo River, approximately 440 feet east of the project site, but are not considered scenic views. Nearby visual landmarks include the Santa

Cruz Beach Boardwalk, approximately 0.2 miles southeast of the project site, but the project is not visible from the Boardwalk or beach area due to distance and intervening topography and structures. Thus, the project site is not visible from scenic viewpoints, and the proposed minor improvements would not affect views to or from scenic areas and visual landmarks.

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). The nearest mapped scenic viewpoint is from Santa Cruz Wharf, and as indicated above, the project site is not visible from the Wharf. The project site is located within an area mapped as "urban skyline" in the LCP, which encompasses the Beach Hill neighborhood, but is not considered a scenic view. The rear portion of the existing motel is visible from a portion of Front Street and the Santa Cruz Riverwalk along San Lorenzo River.

Thus, the proposed minor improvements, including small laundry room addition, 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, the project would result in *no impact* to scenic resources within a state scenic highway.

(c) Visual Character. The project site is developed with an existing motel, associated parking areas and landscaping. The proposed project consists of minor improvements to an existing motel property, including minor expansion and repaving of an existing parking lot, construction of a small laundry room addition, installation of new fencing, and associated site and utility improvements. The proposed improvements are at ground level or underground and would not be visible. The proposed 417-square-foot laundry room addition is small and would not be visually distinguishable from the existing on-site structures for which no modifications are proposed. As such, the proposed new improvements would not degrade the visual character of the existing neighborhood.

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.

There are no other applicable zoning and other regulations governing scenic quality. Therefore, the project would not conflict with applicable zoning and other applicable regulations governing scenic quality or substantially degrade the existing visual character, resulting in *no impact*.

(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. The project would not result in the introduction of a substantial new source of light or glare. The proposed improvements include a parking lot renovation a minor building addition to accommodate a laundry room at an existing motel that has exterior building lighting and parking lot lighting. No other changes will be made to the existing on-site structures. Any lighting associated with the parking area would be similar to what currently exists, which consists of low-level lighting to illuminate the parking lot without spillover onto adjacent properties. Additionally, section 24.14.266 of the City's Municipal Code prohibits direct or sky-reflected glare. Thus, the project would not be expected to create a new substantial source of light and glare, resulting in *no impact*. In addition, the following standard condition of approval will be included in the Project Conditions of Approval.

> **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.7a).

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.7a and 7c). The MBARD's most recent 2015 AQMP utilized AMBAG's 2014 Regional Growth Forecast.

The City had 25,066 existing dwelling units as of January 1, 2026 (SOURCE V.6), and approximately 2,900 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 27,966 dwelling units, which is below the AMBAG Regional Growth Forecast of 28,297 dwelling units for the year 2030 that were factored into the AQMP. The proposed project consists of minor improvements to an existing motel property and would not result in construction of new housing units, an increase in motel rooms or a change in occupancy or use at the existing motel. Therefore, the proposed project 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 (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), inhalable particulates (PM_{10}), fine particulates ($PM_{2.5}$), and lead. High O3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx), which react under certain meteorological conditions to form O_3. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

[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.3b). 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.

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 PM_{10} and SO_2 standards, and is designated attainment/unclassified for the other federal standards. The NCCAB is designated attainment for the state $PM_{2.5}$, NO_2, SO_2, and lead standards, and is designated unclassified for CO in Santa Cruz County. The NCCAB has nonattainment designations for state O_3 and PM_{10} standards.

The MBARD 2012-2015 AQMP, adopted March 15, 2017, identifies a continued trend of declining O_3 emissions in the NCCAB primarily related to lower vehicle miles traveled (VMT), showing that the region is continuing to make progress toward meeting the state O_3 standard during the three-year period reviewed (SOURCE V.7a).

Impact Analysis. The proposed project would indirectly generate temporary emissions during construction. The project would not result in an increase in existing motel rooms or introduce a substantial new source of operational emissions; no stationary sources of emissions are proposed.

Project construction would result in generation of fugitive dust and PM_{10} emissions. According to the MBUAPCD's CEQA Air Quality Guidelines, 8.1 acres could be graded per day with minimal earthmoving or 2.2 acres per day with grading and excavation without exceeding the MBUAPCD's PM_{10} threshold of 82 pounds per day (SOURCE V.7c). The project does include minor excavation and repaving the parking lot within a disturbance area of approximately 0.6 acres that would be well below the MBARD's threshold of 2.2 acres of grading. Thus, project impacts related to fugitive dust generation and PM_{10} emissions during construction would be *less than significant*.

According to the MBARD CEQA Guidelines, projects that are consistent with the AQMP would not result in cumulative impacts, as the AQMP already accounts for regional emissions. The MBARD prepares air quality plans, which address attainment of the state and federal air quality standards, and which incorporate growth forecasts developed by AMBAG. The AQMP takes into account cumulative development within the City, and thus, cumulative emissions have been accounted for in the AQMP. As indicated above in criterion 3(a), the project would not conflict with the AQMP. Therefore, the project's contribution to cumulative air pollutant emissions would be *less than significant*.

(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.7c).

The project site is located within a developed area that includes a review of residential and visitor-serving uses, with existing residences to the east and west that are considered sensitive

receptors. Nearby educational facilities are also considered sensitive receptors, including Santa Cruz High School located approximately 0.68 miles northwest of the project site and Sycamore Street Early Education Center located approximately 0.21 miles to the northwest of the project site. The proposed 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 Manual[2]) 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-Appenix A).

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

Construction of the proposed project could utilize some vehicles that use diesel fuel, although the proposed improvements are minor and likely would not require use of heavy equipment for extended periods of time. A standard City 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.7c), land uses associated with odor complaints typically include landfills, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, and refineries. The existing motel use does not include any activities associated with odors, the proposed minor parking lot and laundry room improvements would not add activities that would create objectionable odors. Thus, *no impact* would occur regarding generation of odors or other emissions.

4. Biological Resources

(a-c) Special-Status Species and Sensitive Habitat. The project site is developed with an existing motel, associated parking areas, and landscaped areas. The site contains ornamental landscaping and four existing heritage trees. 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 project site is located within the existing developed Beach Hill neighborhood. 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. 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.

The project site supports four palm trees that are considered heritage trees under City regulations and other landscaping. Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (CFGC). Construction activities, including grading, trenching, and site improvements conducted during the breeding season (generally February 15 to August 31), have the potential to disturb active bird nests, eggs, or chicks if present. 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 or removed during the nesting season or to remove trees outside of the nesting season.

Impact Analysis. The project would not result in removal of trees, although construction activities occurring in proximity to on-site trees could temporarily disturb nesting birds if any are present. 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 City 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.11) was conducted to review existing trees on the project site. The review identified four 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 considered heritage trees. All four heritage trees are in fair condition and have been determined to be suitable for preservation as part of the proposed project (SOURCE V.11).

Chapter 9.56 of the City Municipal Code defines heritage trees and establishes permit requirements and protection standards. 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 of a heritage tree would be permitted if found in accordance with the criteria and requirements set forth in the Municipal Code. 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.

The project would not remove any heritage trees, and existing trees would be preserved. Thus, the project would not conflict with local policies or ordinances regarding protection of biological resources or tree preservation, resulting in *no impact*. Furthermore, heritage trees on the project site would be retained and protected in accordance with the recommendations in the arborist report (SOURCE V.11), which would ensure that construction-related impacts are minimized and that the health and structural stability of the trees are maintained.

(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 motel buildings were likely constructed during the early 1950s (SOURCE V.12e). Thus, the existing buildings are more than 45 years old and could potentially qualify as historical resources pursuant to CEQA.

> *Impact Analysis*. The proposed project does not propose major modifications to the existing motel buildings, which would be retained as part of the project. The project would result in a minor alteration to existing buildings with the addition of a small 417-square-foot laundry room in between three existing motel buildings on the western side of the property. City staff reviewed this alteration and concluded that it would not materially affect the existing buildings even if the existing buildings were determined to be a historical resource under CEQA. Therefore, the project would not result in a substantial adverse change in the significance of a historical resource, resulting in a *less-than-significant impact* to historical resources.

(b-c) Archaeological Resources. According to maps developed for the City's *General Plan 2030* and as updated in 2018, the project site is located within an area that is identified as being "highly sensitive" for archaeological resources (SOURCE V.1c).

A Phase 1A Archaeological Assessment was conducted for the project site, which consisted of historic map research, an archival records search, and an intensive pedestrian field reconnaissance. The historic map review was conducted using county GIS data and regional digital map collections to establish parcel ownership history. An archival records search was completed through the California Historical Resources Information System (CHRIS) at the Northwest Information Center at Sonoma State University. The records search included a review of previously recorded archaeological resources and prior studies within a ¼-mile radius of the project parcel (SOURCE V.12e). The results of the records search revealed that the project property is situated within a recorded site, CA-SCR-12 (P-44-000018), which is a prehistoric coastal habitation shell midden site.

A pedestrian field survey was conducted, and scattered shell fragments were found throughout the native soils (SOURCE V.12e). Based on the results of the archival research and the field reconnaissance of the property, a Phase II testing program was conducted. The testing program consisted of a series of auger units, standard excavation units, a ground penetrating radar survey, the use of canine forensic specialists, geoarchaeological investigations, aerial drone footage, and sub-meter-accurate GPS mapping. These procedures were conducted in collaboration with the Amah Mutsun Land Trust (AMLT) to determine the presence, absence, and extent of the archaeological site (CA-SCR-12) within the project site (SOURCE V.12b).

The testing program revealed historically significant cultural deposits (SOURCE V.12b). Radiocarbon dating of macrobotanical remains revealed that CA-SCR-12 has likely been continuously occupied from approximately 2800 cal BC to 1800 cal AD (SOURCE V.12b). Extensive historic-era and modern human disturbances to the cultural deposits also were identified throughout the project site (SOURCE V.12b).

The Phase II Testing Study concluded that the project site lies within the historically significant precontact archaeological site, CA-SCR-12. Although the resource's physical integrity appears to be moderate, the archaeological review determined that CA-SCR-12 appears to meet all four significance criteria for inclusion in the California Register of Historic Resources (CRHR), and thus, it is considered a historical resource pursuant to CEQA definition.

Impact Analysis. Ground-disturbing activities associated with the proposed project are very likely to encounter historically significant archaeological materials within the boundaries of a known and recorded archaeological site, which encompasses the project site. Impacts could occur during excavation for on-site sewer line replacement and surface excavations for new landscaping in the proposed renovated parking lot (SOURCE V.12a). Based on the results of the Phase II testing, there is evidence of precontact occupation, and the cultural deposit on the site qualify as historical resources under CEQA section 15064.5 due to its eligibility for listing in the CRHR. Additionally, the shell midden meets the criteria for a unique archaeological resource as defined in Public Resources Code (PRC) section 21083.2 (SOURCE V.12a). Ground disturbance associated with construction also could result in disturbance to historical resources present below ground. Additionally, human burials could be encountered. Therefore, the project ground disturbing activities associated with construction of the proposed improvements would result in a *potentially significant impact*.

As a result of the archaeological testing, the project applicant modified the project to avoid impacts to archaeological resources. The property owner, Santa Cruz Seaside Company, and the Amah Mutsun Tribal Band (AMTB) have entered into a "Memorandum of Agreement" that outlines measures to avoid and minimize subsurface impacts to the sensitive precontact indigenous cultural site, CA-SCR-12. The measures include the following in addition to other measures to work collaboratively to establish an interpretive area:

- Use of fill to "cap" the cultural site in the parking lot;
- Modify site drainage plan to eliminate subsurface storm drains;
- Use of trenchless methods for replacing sewer lines with location of potholes (for trenchless methods) to be selected to avoid ancestral remains;
- Redesign other utilities (water, electrical) to eliminate the need for subsurface trenching;
- Developing a native plant/interpretive area in consultation with the AMLT;
- Conduct any reburials in consultation with AMTB;
- Prepare and implement a Discovery Plan and Treatment Plan for ancestral remains and cultural materials;
- Establish facilities maintenance protocols for future maintenance work on the site; and
- Conduct archaeological and tribal monitoring during any excavation, boring, demolition or soil-disturbing activity.

It is noted that the planned use of fill to "cap" the cultural site in the parking lot will avoid grading and is consistent with measures recommended in CEQA for preservation of archaeological sites. The project archaeologist also recommends construction worker sensitivity training as well as monitoring during construction. With implementation of these measures, potential impacts can be reduced to a less-than-significant level (SOURCE V.12a).

It is also noted that 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 precontact or other 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, in the event that Native American human remains or related cultural material are encountered, Section 15064.5(e) of the CEQA Guidelines (as incorporated from PRC Section 5097.98) and California Health and Safety Code Section 7050.5 require that the County Coroner and the Native American Heritage Commission shall be notified

in accordance with provisions of these codes if the remains are determined to be Native American.

Based on the findings of the Archaeological Impact Assessment, with implementation of Mitigation Measures CUL-1 and CUL-2, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA or disturb human remains, resulting in a *less-than-significant impact*.

MITIGATION MEASURE CULT-1: Implement all measures in the applicant-proposed Memorandum of Agreement between the Santa Cruz Seaside Company and the AMTB as set forth in the signed document, dated February 10, 2026 and March 6, 2026, respectively for the two signatories.

MITIGATION MEASURE CULT-2: Require an archaeologist and Native American to monitor construction within the project area to include cultural sensitivity training for construction workers and archaeological and tribal monitoring during ground disturbing construction.

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.

Energy efficiency efforts have helped make California's per capita energy use the third lowest in the nation. California is second in the nation, after Texas, in total electricity generation from renewable resources, and California is the nation's top producer of electricity from solar energy and geothermal resources. In 2024, California was the nation's second-largest producer of electricity from biomass, after Georgia, and also the second-largest producer of conventional hydroelectric power, after Washington (SOURCE V.9).

The primary uses of energy in urban areas are for transportation, lighting, water heating, and space heating and cooling. Energy conservation strategies can help reduce the consumption of energy, and include weatherization (installation of insulation, more energy-efficient window, and other measures to maintain comfortable interior temperature); installation of more efficient appliances; and installation of solar energy systems. Buildings can also be designed to incorporate energy conservation strategies such as cooling materials and building orientation. 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. The proposed project consists of minor improvements to an existing developed property, including parking lot renovation and a small laundry room addition. Construction equipment would be limited and would require consumption of nonrenewable energy resources, primarily in the form of fossil fuels (gasoline and diesel) 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), 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 construction of the proposed improvements. 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 consists of improvements to an existing motel property, including reconfiguration of the parking area and construction of a small laundry room addition. The project avoids or reduces inefficient, wasteful, and unnecessary consumption of energy by improving site efficiency and incorporating updated building systems. The project would be subject to approval of building permits that comply with the California Building Code and City Green Building Code requirements, as well as City standards for energy efficiency and water conservation features, including drought-tolerant landscaping.

Overall, the future consumption of electrical 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. 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 project would result in renovation of an existing parking lot and addition of a small laundry room, but would not result in construction of new habitable structures. Therefore, the project would result in *no impact* related to fault rupture.

(a.ii-iv, c) Seismic and Geologic Hazards. 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). The northern edge of the project site is mapped as having 50+% slopes (SOURCE V.1b-DEIR Figure 4.10-5).

The project site is relatively flat, but the northern portion of the site is situated along the northern side of a coastal terrace. The bluff along the north side of the property slopes at about 60 percent to an adjacent property about 50 feet below the project site at the base of the bluff (SOURCE V.10d). The site had previously been graded for the construction of the existing motel. Non-engineered fill appears to be located along the northern and eastern sides of the site and below the structure (SOURCE V.10d).

A geotechnical investigation was prepared for the project site that included soil borings on the northern portion of the site and laboratory testing (SOURCE V.10d). The parcel is underlain by Marine Terrace Deposits overlying Purisima Formation. Soil borings encountered about 4 feet of non-engineered fill over about 4 to 9 feet of Marine Terrace Deposits. Very dense Purisima Formation sandstone was encountered between 8.5 and 11 feet (SOURCE V.10d). Additional soil borings and testing were conducted in the parking lot which found about 4 feet of engineered fill at the west side of the parking lot (SOURCE V.10c).

The project geotechnical investigation identified intense seismic shaking, collateral seismic hazards, and landsliding as geological hazards affecting the project site. Collateral seismic hazards include fault ground surface rupture, coseismic ground cracking, seismically induced liquefaction and lateral spreading, seismically induced differential compaction, seismically induced landsliding, and seismically induced inundation (tsunami and seiche), but the geotechnical investigation indicated that the potential for collateral seismic hazards to affect the project site and damage the proposed structure is low with the exception of landsliding (SOURCE V.10d).

The northern side of the property is at the top of a steep slope. Soils borings conducted at the site at the crest of the slope encountered loose non-engineered fill and loose in-situ soil overlying dense sandstone. Based on a qualitative analysis, there is a moderate risk of shallow landsliding in the soil over the sandstone (SOURCE V.10d). The geotechnical investigation also indicated that the existing structure is underlain by loose non-engineered fill and loose in-situ soil that show signs of settlement. The existing concrete patio along the entire length of the northern slope has cracked, settled and translated downslope about 1 inch. (SOURCE V.10d).

Impact Analysis. The proposed project consists of minor improvements, including a parking lot renovation, addition of a small laundry room, and other utility improvements that would be subject to seismic shaking from an earthquake on regional faults, and the northern edge of the property would subject to potential landslide hazards. However, with implementation of the geotechnical investigation recommendations, exposure to seismic and geologic 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.

The project geotechnical investigation indicates that the project could be constructed with implementation of recommendations in the report, which include, but are not limited to removal of non-engineered fill, use of engineered fill where there is placement of fill, drainage control, and recommendations for foundation design for existing buildings with evidence of settlement (SOURCE V.10d). In areas where fill was not encountered and concrete foundation slabs on grade are used, the geotechnical investigation recommends that the upper 12 inches of subgrade be removed and replaced with engineered fill (SOURCE V.10c). It also was recommended that the non-engineered fill beneath proposed new parking lot pavements should be removed and replaced with engineered fill per recommendations in the geotechnical report (SOURCE V.10c).

Subsequent reviews of project plans by the geotechnical engineer found that the project plans do not conform with the recommendations of the geotechnical report and addendum, indicating that there is potential for settlement and cracking to occur in parking/hardscape improvements and in the laundry room concrete slab-on-grade due to settlement of non-engineered fill and un-compacted subgrade soil (SOURCE V.10a and V.10b).

As indicated in Section VI.5(b-c), the project applicant has agreed to leave existing soils in place in order to protect known cultural resources and minimize potentially significant archaeological impacts to a less-than-significant level. The project applicant also has indicated that the risk of potential settlement and cracking in the renovated parking lot is understood and accepted (SOURCE V.13a).

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. 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 proposed project would result in renovation of an existing parking lot and construction of a new small laundry room in areas underlain by non-engineered fill. As indicated above, the project applicant also has indicated that the risk of potential settlement and cracking in the renovated parking lot is understood and accepted (SOURCE V.13a). Not removing the non-engineered fill under the parking lot would not cause risk of injury or death, although, additional ongoing parking lot repaving may be required. The proposed laundry room also would be situated in an area underlain by non-engineered fill for which foundation designs were recommended in the project geotechnical report. Demonstration of project design adherence to geotechnical report recommendations will be required at the time of building permit application that demonstrates that the proposed laundry room is designed to current seismic design standards and foundation recommendations in the project geotechnical report. Compliance with recommendations in the project geotechnical report and with the California Building Standards Code would reduce risks associated with strong seismic ground shaking and settlement at the project site. Therefore, impacts related to seismic hazards would be *less than significant*.

(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 Elkorn Sandy Loam soils, with 2 to 9 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 not involve grading, and excavation for utility line replacement would be limited. The project plans show approximately 230 cubic yards of excavation and approximately 50 cubic yards of fill within the area of the proposed improvements. The project plans also include standard erosion control best management practices (BMPS), consistent with the City of Santa Cruz's standard erosion and sediment control requirements. The General Plan 2030 EIR concluded that future development 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. Therefore, with the limited area of disturbance and implementation of proposed erosion control measures, potential erosion during construction would be minimized, resulting in a *less-than-significant impact*.

(d) Expansive Soils. Expansive soils are soils with high clay content that are prone to expansion and contraction, known as "shrink-swell," which can result in damage to building foundations, pavement, and underground utilities (SOURCE V.1b-DEIR). 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 Elkorn Sandy Loam soils, with 2 to 9 percent slopes (SOURCE V.1b-DEIR Figure 4.10-6). According to the U.S. Conservation Service, these soils have a low to moderate potential for expansive soils. However, expansive soils were not encountered or identified in the project geotechnical report (SOURCE V.10d). Therefore, the proposed project improvements would not be located on expansive soils, resulting in *no impact*.

(e) Septic Systems. The project site is connected to the City's sewer system. Neither the existing motel nor the proposed minor improvements would use septic systems. 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 Purisima formation (SOURCE V.1b-DEIR Figure 4.9-5). Holocene Alluvium is one of the four geologic units in the General Plan area known to contain paleontological resources (SOURCE V.1b-DEIR volume). The project geotechnical report found non-engineered soils underlain by Marine Terrace Deposits and Purisima formation at depths of 8-11 feet.

The project site does not contain known paleontological resources. The project would not involve grading, and excavation for utility line replacement would be limited. As indicated in Section VI.5(b-c), the project applicant has agreed to leave existing soils in place in order to protect known cultural resources and minimize potentially significant archaeological impacts to a less-than-significant level. Thus, the project would not result in excavation at depths to geological formations that could potentially expose paleontological resources, resulting in *no impact*.

It is also noted that 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.

> **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 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. Emissions would be limited as construction involves minimal improvements to slightly expand and repave an existing parking lot and construct a new small laundry room. Operational emissions would be related to use of laundry facilities.

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 CO_2e 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.7b). 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.

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 proposed project does not include new or expanded land uses but consists of minor improvements to an existing developed motel. Once constructed, GHG emissions would be limited to operation of new laundry facilities that would incorporate energy-efficient appliances, thus minimizing GHG emissions. Furthermore, the proposed laundry room would replace a smaller laundry room that was part of the existing motel. Thus, the project would result in a minimal, if any, increase in GHG emissions, resulting in 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 improvements to an existing motel property, which would not involve the routine transport, use, or disposal of hazardous materials or wastes. The nearest school to the project site is Santa Cruz High School, located approximately 0.68 miles away. However, the proposed project involves site improvements and a small accessory building addition 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*.

(d) Hazardous Materials Sites. Pursuant to Government Code Section 65962.5, the State of California Hazardous Waste and Substances Site List (also known as the "Cortese List") is a

planning document used by state and local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous materials sites. The project site is not included on the lists of hazardous material sites compiled pursuant to Government Code Section 65962.5 (SOURCE V.5). A search of the Department of Toxic Substances Control (DTSC) Envirostor database indicates that the closest active cleanup site is approximately 0.26 miles north of the project site (SOURCE V.5). According to California State Water Resources Control Board's GeoTracker database, the nearest cleanup site is the Fromer Pottery Planet, approximately 2.11 miles northeast of the project site (SOURCE V.5). Additionally, the project is not included on hazardous waste disposal sites or hazardous waste facilities subject to corrective action (SOURCE V.5). Therefore, the project is not included in or near any identified hazardous sites that could create a significant hazard to the public or the environment, resulting in *no impact*.

(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 3rd 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.

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 proposed project consists of minor improvements to an existing motel that would result in a net decrease in impervious surfacing with provision of stormwater treatment measures consistent with City requirements. The project site is currently developed with an existing motel and parking lot. Project improvements would include renovation of the parking lot that would slightly expand and repave the existing parking lot. The project also includes construction of a new small, 417-square-foot laundry room. The project plans indicate that impervious surfacing would decrease by approximately 1,070 square feet. Stormwater runoff would be directed to an on-site drainage biofiltration area in the northern portion of the site to allow for treatment prior to discharge into a storm drain on 3rd Street, which would minimize the potential for discharge of urban pollutants into the City's storm drain system. Project stormwater drainage improvements have been designed in accordance with City standards and Public Works requirements in order to meet water quality standards. As indicated in Section VI.7(b), potential erosion during construction would not be significant. Therefore, the

project would not substantially degrade water quality or violate any water quality standards, resulting in a *less-than-significant 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 minor improvements to an existing motel including site improvements and a small laundry room addition. 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 developed with an existing motel and parking lot with landscaping. The site currently drains to the municipal storm drain system.

Impact Analysis. Project development would involve renovation of the existing parking lot with additional landscaping and construction of a new 417-square foot laundry room. The project would replace existing impervious surfaces with some new areas of impervious surfacing. However, the project would result in a net decrease in impervious surfaces by approximately 1,070 square feet.

On-site stormwater management would be provided in compliance with City of Santa Cruz requirements. Stormwater runoff would be directed to on-site drainage improvements, including a proposed biofiltration area. 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. The proposed project would not alter the existing drainage pattern of the site or surrounding area and would not lead to substantial erosion, increases in rate or amount of surface runoff, or contribute runoff that exceeds storm drain system capacity. 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 or potentially redirecting or impeding flood flows.

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.2f). 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 a biofiltration area, 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 site is located on Beach Hill in the Beach Area neighborhood of the City. The noise assessment conducted for the General Plan 2030 EIR indicates that 3rd Street between Front Street and the project site is subject to noise levels of 64 decibels (dB) Ldn (day-night average level) 50 feet from the center of the road and falls 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 along 3rd Street and adjoining streets; sounds of rides and people at the Santa Cruz Beach Boardwalk also are occasional sources of noise in the neighborhood. The nearest sensitive noise receptors are residential uses adjacent to and across the street from the project site.

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 noise levels, but would not result in increases in permanent noise levels as discussed below. The nearest sensitive noise receptors are residential uses adjacent to and across the street from the project site.

Temporary Noise Increases. There would be a temporary increase in existing noise levels with the proposed parking lot renovation and construction of a small laundry room, which is anticipated to occur over a short period of approximately five 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. 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 minor 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 proposed project consists of improvements to an existing motel property, consisting of parking lot renovation and addition of a small laundry room. The proposed project would not result in new sources of operational/permanent noise, and thus would result in *no impact* regarding permanent increases in ambient noise levels. Therefore, the project would not result in generation of a permanent increase in ambient noise levels, and temporary increases in ambient noise during construction would be considered a *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.

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. The proposed project consists of minor improvements that would not use heavy equipment or pile driving equipment that could result in vibration. Thus, project construction would not result in activities or use of equipment that would create excessive vibration or expose people to excessive vibration and impacts, resulting in *no impact*.

(c) Location Near Airport. The closest public airport is the Watsonville Municipal Airport located more than 13 miles south of the project site in the City of Watsonville. The Bonny Doon Airport, a private airstrip, is located approximately 9.3 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 63,065 people as of January 1, 2026 (SOURCE V.5). The proposed project consists of improvements to an existing motel property and does not include the development of new residential units. As such, the project would not directly increase the permanent residential population of the City. Therefore, the project would not result in increased population, resulting in *no impact*.

(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, resulting in *no impact*.

15. Public Services

(a-b, e) Fire, Police and Other Public Services. The existing motel on the project is served by existing public services. The proposed project consists of minor improvements to an existing motel, comprised of a parking lot renovation and addition of a small laundry room. The proposed project would not expand existing motel rooms or uses. Therefore, the project would not result in an incremental demand for police and fire protection services and other public services provided by the City of Santa Cruz, resulting in *no impact*.

It is noted that a recent review of cumulative impacts on City fire and police protection services was conducted as part of an EIR prepared for Santa Cruz Downtown Plan Expansion Project (SOURCE V.2b). The review included 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.2b). The review found that the City's Fire Department currently has inadequate space and equipment to meet existing needs. 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.2b).

(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.8). 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.8).

The proposed project consists of improvements to an existing motel property and does not include construction of residential units. As such, the project would not generate new student enrollment within the Santa Cruz School District (SCSD), resulting in *no* impact related to school facilities.

(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 are Beach Flats Park and Poets Park-Beach Flats Community Gardens east of Riverside Drive. Riverside Gardens Park and John D. Franks Park are located adjacent to the San Lorenzo Boulevard, northeast of the project site.

The proposed project consists of improvements to an existing motel property and does not include the construction of residential units and does not include expansion of the existing motel. As such, the project would not result in an increase in the permanent residential population or temporary visitor population that may use local parks. Thus, the proposed project would not result in an increased demand for parks or require new or physically altered parks, resulting in *no impact*.

16. Recreation

(a) Use of Existing Parks and Recreational Facilities. As indicated above, the proposed project consists of improvements to an existing motel property and would not result in an increase in the permanent residential population or temporary visitor population. Therefore, the project would not result in increased use of parks that could potentially lead to deterioration of parks or recreational facilities, resulting in *no impact*.

(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 would continue to be accessed via an existing driveway from 3rd Street. No new vehicular access points are proposed. The project includes reconfiguration of the existing parking area to provide a total of 25 on-site parking spaces, an increase from the existing 22 spaces.

The local roadway network serving the project site includes 3rd Street, Cliff Street, Front Street, Laurel Street, and San Lorenzo Boulevard, which provide connections to the broader City circulation system and State Route 1. The project site is located within a developed area with access to transit, pedestrian, and bicycle facilities. Sidewalks and local streets provide pedestrian connectivity to nearby destinations, including downtown, the San Lorenzo River corridor, and the Santa Cruz Beach Boardwalk. Local METRO bus stops are located at the intersection of Front Street and Laurel Street, approximately 0.2 mi north of the project site (Routes 3A, 3B, 16, 18, 19, and 20), and along Pacific Avenue near Center Street, approximately 0.18 miles northwest of the project site (Routes 19 and 20). Pedestrian facilities are located throughout the area, including sidewalks along 3rd Street.

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 consists of improvements to an existing motel property in an urbanized area with access to transit, pedestrian, and nearby commercial services. 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).

The project would not conflict with any policies, programs, or regulations addressing the circulation system, including transit, roadway, and pedestrian facilities. The project is located in a developed area near transit, services, and recreation, with sidewalks and an established street network providing connectivity to surrounding uses. The project would not result in an increase in visitor or residential population. Therefore, the project would result in *no impact* with regard 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. The proposed project consists of improvements to an existing motel property, including reconfiguration of the existing parking area and construction of a small laundry room. The project would not increase the intensity of the existing motel use or result in an increase in vehicle trips. As such, the project qualifies as a small project that would not generate new vehicle trips. Based on the City's screening criteria, the project would not result in a significant impact related to VMT and is screened out from further transportation analysis. Therefore, the project would result in *no impact* related to VMT and would not conflict or be inconsistent with CEQA Guidelines section 15064.3. Additionally, it is noted that the project site is located within a developed urban area in proximity to transit, including bus stops along Front Street and Laurel Street within walking distance of the site. The availability of nearby services and destinations support reduced travel distances and the use of alternative transportation modes.

(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 includes reconfiguration of the existing parking area and associated site improvements, which would maintain adequate circulation and access for vehicles. Emergency access would be provided via the existing public street frontage along 3rd Street, and the site would continue to accommodate emergency vehicles in accordance with City Fire Department requirements. 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 May 5, 2026 (email), which was within 14 days of determining the Project application was complete. Neither Native American tribe has contacted the City of Santa Cruz and requested consultation.

As described in Section VI.5(b-c) above, an archaeological investigation testing of the site found that the project site is located within an existing recorded archaeological site (CA-SCR-12). Based on the Phase II testing report dated July 28, 2025, the site has yielded evidence of precontact occupation. The cultural deposits on the site qualify as historical resources pursuant to CEQA Guidelines section 15064.5 due to their eligibility for listing in the CRHR, particularly under Criterion 4 as discussed in Section VI.5(b-c). Additionally, the site meets the criteria for a unique archaeological resource as defined in Public Resources Code section 21083.2 (SOURCE V.12a).

No specific tribal cultural resources have been identified, although the recorded archaeological site qualifies as a tribal cultural resource. The site holds cultural value to local tribes (SOURCE V.12a).

Impact Analysis. Ground-disturbing activities associated with the proposed project are very likely to encounter historically significant archaeological materials within the boundaries of a known and recorded archaeological site, which encompasses the project site. Impacts could occur during excavation for on-site sewer line replacement and surface excavations for new landscaping in the proposed renovated parking lot (SOURCE V.12a). Based on the results of the Phase II testing, there is evidence of precontact occupation, and the resources on the site qualify as historical resources under CEQA section 15064.5 due to their eligibility for listing in the CRHR and as a unique archaeological resource as defined in CEQA (SOURCE V.12a). The site qualifies as a tribal cultural resource, but such determination has not been made by Native American tribes, although the cultural sensitivity of the area has been highlighted by local tribes (SOURCE V.12a). Therefore, the project ground disturbing activities associated with construction of the proposed improvements would result in a *potentially significant impact* to a potential tribal cultural resource.

As a result of the archaeological testing, the project applicant modified the project to avoid impacts to archaeological resources. As indicated in Section VI.5(b-c), the property owner, Santa Cruz Seaside Company, and the Amah Mutsun Tribal Band (AMTB) have entered into a "Memorandum of Agreement" that outlines measures to avoid and minimize subsurface impacts to the sensitive precontact indigenous cultural site, CA-SCR-12. The project archaeologist also recommends construction worker sensitivity training as well as monitoring during construction. With implementation of these measures, potential impacts can be reduced to a less-than-significant level (SOURCE V.12a). Based on the findings of the Archaeological Impact Assessment, with implementation of Mitigation Measures CUL-1 and CUL-2 identified in Section VI.5(b-c), the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA or disturb human remains, resulting in a *less-than-significant impact* to potential tribal cultural resources.

19. Utilities and Service Systems

(a) Relocation or Construction of Utilities. The project would be served by existing utilities. These utility improvements would occur within the previously developed areas of the site. The project would not require the relocation or construction of major off-site utility facilities and would not require the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or which could cause significant environmental effects. Therefore, the project would result in *no impact* related to the relocation or construction of utilities.

Onsite project improvements include replacement of an on-site sewer line. As discussed in Sections VI.6(b-c) and 18(a-b), onsite excavation for utility work could result in potentially significant impacts to archaeological and tribal cultural resources and human burials, which could be mitigated to a less-than-significant level.

(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, and the University of California at Santa Cruz campus. The unincorporated areas served by the City of Santa Cruz include Live Oak, the area along Graham Hill Road that extends north of the city, and limited service along the coast north of the city, primarily along State Highway 1. 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. All of the City's water supplies are obtained from local sources. No water is purchased from state or federal sources or imported to the region from outside the Santa Cruz area. 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. The balance of the City's supply comes from groundwater, all of which is extracted from the Beltz Well system in the Santa Cruz Mid-County Groundwater Basin. During the past ten years, the North Coast sources represented 20 percent of the total water supply, the San Lorenzo

River represented 60 percent, Loch Lomond Reservoir (Newell Creek) represented 15 percent, and Beltz Well system contributed the remaining 5 percent The City does not currently operate its own recycled water system, but the Pasatiempo Golf Course, a customer of the Water Department, uses recycled water supplied by the City of Scotts Valley and treated onsite, which reduces demand for potable water from the Santa Cruz system. (SOURCE V.2a).

Existing and Future Water Demand. The City's 2025 Urban Water Management Plan (UWMP), which was adopted by the City Council pursuant to state law, reports that for many decades, water use in Santa Cruz increased along with population and new water service accounts, except during two major drought periods in the late 1970s and the early 1990s. Around 2000, this pattern changed: demand began to flatten, accelerated by price changes, drought, economic downturn, and other factors. In 2015, after two years of drought and water rationing, annual water use fell to a level of about 2.5 billion gallons, similar to the use during the 1970s drought. In 2025, demand remains at a similar level, around 2.6 billion gallons. While demand did rebound to prior levels following droughts in the 1970s and 1980s, demand has not rebounded to pre-drought conditions following 2015, contrary to previous projections. Water demand is expected to grow slowly and reach approximately 2.9 billion gallons per year by 2045 and 2050 (SOURCE V.2a).

Water Supply Augmentation Strategies-Future Water Projects. Although Santa Cruz has a very low system-wide water demand, it still faces ongoing water supply reliability challenges as discussed below. The amount of water available from the City's flowing water sources can change dramatically from year to year, resulting in inconsistent water supply. Climate change is expected to make the City's water supplies even more variable, and the City has limited storage capacity to weather multi-year droughts. The City is also committed to improving fish habitat by diverting less water from its flowing sources at certain times. To address these reliability issues, the City is advancing a set of water system projects designed to improve long-term reliability (SOURCE V.2a).

Since 2016, 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 City's 2025 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.

Since 2015, the Water Department has advanced the study of these elements, initiating and completing a significant body of work that provides additional details about cost, yield and timeliness of using the available supply augmentation sources to improve supply reliability. These efforts yielded two key policy and planning documents: the City's Securing Our Water Future Policy (SOWF), adopted in 2022, and the Water Supply Augmentation Implementation Plan (WSAIP), completed in 2025, which lay out a pathway for the City to implement supply augmentation alternatives in a phased manner to increase supply reliability (SOURCE V.2a).

The City's WSAIP, finalized in 2026, advances the planning of the supply augmentation elements identified in the WSAS. The WSAIP evaluates multiple water supply alternatives including transfers and exchanges, ASR, recycled water, and desalination. The WSAIP compiled and ranked various portfolios of water supply alternatives, and provided a recommended portfolio. A key part of the WSAIP is an adaptive roadmap strategy which identifies key decision points which could result in changes to the water supply augmentation strategy. The selected portfolio includes the following water supply alternatives:

- Construction of ASR facilities
- Transfers and in-lieu groundwater banking with Scotts Valley Water District in the Santa Margarita Groundwater Basin
- Transfers with Soquel Creek Water District (SOURCE V.2a).

Should the selected alternatives prove infeasible or unable to yield the necessary supply, the City could pursue an alternate path as identified in the WSAIP. In this scenario, a local direct potable reuse project would be advanced first. If a potable reuse project could not be completed (e.g., due to inability to secure permits, public opposition, or inadequate wastewater supplies), a desalination project would be advanced (SOURCE V.2a). The City also has embarked on a Capital Investment Program (CIP), 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. Some elements of the program will directly implement supply augmentation alternatives identified in the WSAIP to meet the goals of the WSAS. The CIP also includes projects that will support reliability such as improvements to the Graham Hill Water Treatment Plant, Tait Diversion, and Coast Pump Station (SOURCE V.2a).

Water Supply Availability. The 2025 UWMP includes two statewide-required assessments:

1. Drought Risk Assessment (DRA) – evaluates the next five years (2026–2030).
2. Water Service Reliability Assessment (WSRA) – evaluates reliability through 2050 under normal, dry, and extended drought conditions.

Both the DRA and WSRA incorporated the City's planned water supply augmentation program. Although the planned water supply augmentation projects are not yet complete, the projects are advancing and are expected to be built. Therefore, the projects are included in the forecasts of future water supplies.

The WSRA under historic hydrology found that water supply would meet projected demand under all conditions. The WSRA under the selected climate change condition found that water supply would meet projected demand under normal/average year and single-dry year conditions in all years through 2050. Under the selected climate change condition in the five-consecutive year drought condition, in 2030 a small shortage (four percent) could occur in the fifth year of the drought sequence, but after 2035, implementation of planned projects would provide adequate supply to meet projected demand through 2050 (SOURCE V.2a).

The short-term DRA and longer-term WSRA show that while the City remains vulnerable to extreme drought, particularly in the near term, the planned projects that the City is actively pursuing are expected to provide adequate supply to reliably meet projected demand through 2050. In the event that supplies fall short of demand resulting in a water shortage emergency, the Water Shortage Contingency Plan would be implemented (SOURCE V.2a).

Impact Analysis. The proposed project could potentially result in minor increase in potable water demand, which would not be substantial and could be served by existing City water supplies, and 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 consists of minor improvements to an existing motel property and would result in only a minimal, if any, increase in water demand associated with the proposed new laundry room. However, net water use would be at least partially offset with installation of water-conserving fixtures and appliances. Furthermore, the proposed laundry room would replace a smaller laundry room that was part of the existing motel. The project's water demand would represent a negligible portion of the total existing and projected future water demand identified in the City's updated 2024 water demand projections.

As indicated above, the assessments conducted for the recently adopted 2025 UWMP, which account for development and growth to the year 2045, found that water supply would meet projected demand under all conditions and under the selected climate change condition found that water supply would meet projected demand under normal/average year and single-dry year conditions in all years through 2050. Under the selected climate change condition in the five-consecutive-year drought condition, in 2030 a small shortage (four percent) could occur in the fifth year of the drought sequence, but

after 2035, implementation of planned projects would provide adequate supply to meet projected demand through 2050 (SOURCE V.2a). While the City remains vulnerable to extreme drought, particularly in the near term, the planned projects that the City is actively pursuing are expected to provide adequate supply to reliably meet projected demand through 2050. In the event that supplies fall short of demand resulting in a water shortage emergency, the Water Shortage Contingency Plan would be implemented (SOURCE V.2a).

During periods of dry years and drought, water customers could be subject to water curtailment as enacted by the City. Project residents would be required to comply with required curtailment orders if imposed as would all of the service area customers. The Project's estimated water demand is very minimal compared to the total projected water demand in 2030. 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.

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. 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. However, the Project's water demand associated with a new laundry room would be a negligible, if any increase, with use of water efficient appliances and fixtures, and would be very minimal compared to the total projected water demand in 2030. 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 a minor 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 . The City also considered availability of water supplies to serve development and growth to the year 2045 in the 2025 UWMP.

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 consists of minor improvements to an existing motel property and would result in only a minimal increase in wastewater with the proposed new laundry room. However, net wastewater generation would be at least partially offset with installation of water-conserving fixtures and appliances. 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. Furthermore, the proposed laundry room would replace a smaller laundry room that was part of the existing motel.

(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.2b).

The proposed project consists of improvements to an existing motel property, but would not result in new motel rooms or operations that would increase solid waste generation. Thus, the project would not generate solid waste in excess of existing landfill capacity or not be in compliance with applicable regulations, resulting in *no impact*.

20. Wildfire

(a) Emergency Plans. Existing and proposed access to the project site would be from 3rd Street. The proposed project consists of improvements to an existing motel property and would not include changes to the surrounding public roadway network that provides emergency access to the site. The project would maintain existing access conditions and would not obstruct or interfere with emergency response routes or evacuation plans. 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 proposed project consists of minor improvements to an existing motel property and would not require construction of new off-site infrastructure that could exacerbate wildfire risks. Proposed project improvements include minor sewer line replacement. Therefore, the project would not require installation of infrastructure that could exacerbate fire risk, resulting in *no impact*. See also section VI.9(g) above.

21. Mandatory Findings of Significance

(a) Quality of the Environment. The proposed project would have potentially significant impacts on cultural resources or a major period of California history or prehistory that would be mitigated to a less-than-significant level with implementation of mitigation measures as discussed in Section VI.5(b-c). 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 environment or otherwise substantially adversely affect fish and wildlife habitats or threaten to eliminate a plant or animal community.

(b) Cumulative Impacts. The proposed project would not result in new development that would generate new visitors or residential population and thus would not contribute to cumulative impacts with other development projects that are under construction or approved within the City. The project would result in potentially significant cultural resources impacts that would be mitigated to a less-than-significant level with implementation of mitigation measures as discussed in Section VI.5(b-c). There are no other known pending projects that would contribute to this impact, except for a potential project at 902 3rd Street. A pre-application has been submitted to convert an existing building into a 13-unit apartment building, to demolish two existing buildings, and to construct a 27-unit apartment building at this site. This site is located on 3rd Street further west of the project site within a highly sensitive archaeological area according to City maps. Thus, this site could also contain sensitive cultural resources. However, in accordance with the City's *General Plan 2030* (HA1.2.2), projects located within highly sensitive or sensitive archaeological areas must have an archaeological investigation prepared in which mitigation measures must be outlined if there would be potentially significant impacts. Thus, significant impacts would be avoided or reduced. As such, the proposed project in combination with a future potential project at 902 3rd Street would not result in a significant cumulative impact to cultural resources with implementation of mitigation measures as required by City policies. Therefore, the project and other potential cumulative projects would not result in a cumulatively considerable impact.

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