

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: Water-Street

HEROS Number: 900000010410370

Start Date: 07/09/2024

Responsible Entity (RE): SANTA CRUZ, 809 Center St Santa Cruz CA, 95060

RE Preparer: Jessie Bristow

State / Local Identifier:

Certifying Officer: Jessie Bristow

Grant Recipient (if different than Responsible Entity): CRP Affordable Housing and Community Development

Point of Contact: Garrett Bascom

Consultant (if applicable): Partner Engineering and Science, Inc.

Point of Contact: Allyson Shaw

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 917, 919, 923 Water St, Santa Cruz, CA 95062

Additional Location Information:

The subject property is located on the northwest corner of the Water Street and Stanford Avenue intersection within a residential and commercial area of Santa Cruz. The immediate surrounding properties include Vacant land (117 Stanford Avenue) and single-family residences (918-922 North Branciforte Avenue) to the north; Stanford Avenue beyond which is a single-family residence (118 Stanford Avenue), West Bay Tires (1005 Water Street), and Advanced Auto, RPM Auto Repair, Cycle Imagery, and Desert Dream Belly Dance (1025-1031 Water Street) to the east; Water Street beyond which is Branciforte Small Schools Campus (840 North Branciforte Avenue) to the south; and single-family residence (914 North Branciforte Avenue), two commercial buildings (908 North Branciforte Avenue and 911 Water Street), and The Argus Company used car sales (905 Water Street) to the west.

Direct Comments to: jbristow@santacruzca.gov
337 Locust Street, Santa Cruz, CA 95060

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

The subject property is currently vacant land improved with unoccupied structures. Currently, there are no onsite operations. The subject property consists of three one-story commercial buildings located on the southwest and east sides of the property and one two-story residential building with an associated one-story barn located on the south/central portion of the property. In addition to the current structures, the subject property is also improved with concrete-paved yard areas on the west side and perimeter fencing. The subject property is proposed to receive financing via 25 Project Based Vouchers through the City of Santa Cruz. The proposed project will include the demolition of the existing structures and the new construction of a residential structure consisting of 83 affordable low-income housing units consisting of 34 one-bedroom units, 24 two-bedroom units, and 25 three-bedroom units. A Phase I Environmental Site Assessment was completed for the subject property on July 15, 2024. This assessment has revealed no evidence of controlled recognized environmental conditions (CRECs) or historical recognized environmental conditions (HRECs) in connection with the subject property; however, a recognized environmental condition (REC) was identified, and recommendations are provided. Further discussion on this REC is provided in the Contamination and Toxic Substances Section of this report.

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

The project is projected to increase affordable housing by 85 units located on a 0.582-acre plot of land utilizing Project Based Vouchers. According to the City of Santa Cruz

2030 General Plan, Santa Cruz has set forth goals to encourage development of housing affordable to people with special housing needs including seniors, people with disabilities, college students, single income households, and people experiencing homelessness and promote affordable housing developments while balancing the community needs with social and environmental responsibility. The proposed project will assist the county in their vision for the need of safe, resilient, and affordable housing opportunities for the City of Santa Cruz.

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

The subject property is located on the northeast side of Santa Cruz, California. The geographical and physical region provide a positive environment for residents and businesses. The surrounding area of the subject property is mix of commercial businesses and single-family residential neighborhoods. The project is located near a major intersection which offers many amenities including restaurants, retail, and employment options.

Maps, photographs, and other documentation of project location and description:

[Unit concept plan.pdf](#)

[Site Plan.pdf](#)

[24116 ALTA SURVEY 2024 05 24.pdf](#)

[24 451938 1 Fig 2 Site Plan Landscape.pdf](#)

[24 451938 1 Fig 1 Site Location Map.pdf](#)

Determination:

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| ✓ | Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment |
| | Finding of Significant Impact |

Approval Documents:

[EA Signature Page 917-923 Water Street.pdf](#)

7015.15 certified by Certifying Officer

on:

7015.16 certified by Authorizing Officer

on:

Funding Information

| Grant / Project Identification Number | HUD Program | Program Name | Funding Amount |
|---------------------------------------|----------------|-------------------------------|----------------|
| # | Public Housing | Project-Based Voucher Program | \$5,852,615.00 |

Estimated Total HUD Funded, Assisted or Insured Amount: \$5,852,615.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$43,160,000.00

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

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| Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6 | Are formal compliance steps or mitigation required? | Compliance determination (See Appendix A for source determinations) |
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6 | | |
| Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The nearest airport is the Watsonville Municipal Airport located approximately 15.82 miles to the southeast of the proposed project. The project is in compliance with Airport Hazards requirements. |
| Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. |
| Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). According to Community Panel Number 06087C0332E, dated May 16, 2012, the |

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| | | subject property is not located within a Special Flood Hazard Area (SFHA). Review of the online NFIP information, the city and county are active participants within the NFIP. The community identification numbers are as follows: city CID is 060355F and county CID is 060353F. The project is in compliance with flood insurance requirements. |
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5 | | |
| Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project's county or air quality management district is in attainment status for all criteria pollutants. Review of the online EPA air quality information for California through the EPA State Implementation Plan (SIP) indicated the designated areas for SIP requirements does not include the subject property. As such, nonattainment pollutant areas are not considered a concern for the subject property. The project is in compliance with the Clean Air Act. |
| Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The state of California does include Coastal Zones which includes properties located within three (3) nautical miles offshore of the Pacific Ocean. Based on the lack of coastal zones identified at the subject property and distance from coast to the subject property, no further assessment regarding Coastal Zones appears warranted at this time. The project is in compliance with the Coastal Zone Management Act. |
| Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Partner completed a Phase I Environmental Site Assessment completed by Partner on July 15, 2024, a REC was identified. Potential environmental concerns with historical operations include use of the unpaved areas of the subject property as a junk |

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| | | <p>yard for equipment and vehicles from at least 2005 to 2020 and the reported use of a 285-gallon gasoline UST. The UST was reportedly installed in 1968 for use by a mattress factory, located to the north of the current barn structure, and reportedly removed in the early 1990s by the property owner at that time. No documentation pertaining to the removal of the tank or any subsurface investigations during removal was available. A subsurface investigation was conducted at the subject property by AEI Consultants in 2021. 5 exploratory borings were advanced at the property with soil, soil vapor, and grab groundwater samples collected. Arsenic and lead were detected in soil samples exceeding their respective residential and commercial/industrial direct exposure ESLs established by the RWQCB. Benzene and PCE were also detected in soil gas samples at concentrations exceeding their respective residential vapor intrusion ESLs but below their respective commercial/vapor intrusion ESLs. The responsible parties are identified as David Rasmussen and Trustee Venus B. Rasmussen. This case is also listed as an open cleanup case, identified as Rasmussen Property (917-923 Water Street, Case#: RO0000421) on the RWQCB GeoTracker database with the lead oversight agency listed as SCCEH. Based on the open regulatory status of this case and the proposed redevelopment of the subject property, this release is considered a REC. Partner understands that the applicant will incorporate an appropriate barrier vapor barrier design to minimize any vapor intrusion impacts from the identified contaminants of concern. A Geophysical Investigation Report prepared by Partner in October 2024</p> |
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| | | <p>was completed to investigate the potential location of on-site USTs, former tank holds, and/or other associated features beneath the subject property. No evidence of existing metallic features resembling a UST was identified within the survey area investigated. Review of the EPA Radon Zone Map and county information indicates the subject property is located within Radon Zone 2. Based on the proposed development activities, radon mitigation is warranted as part of new construction activities. Per HUD guidelines, radon mitigation activities are required to be implemented during the construction phase of the subject property per CC-1000, latest edition, Soil Gas Control Systems in New Construction of Buildings. The guidelines require soil gas control for all portions of the foundation system and post-construction testing will be required by a licensed radon professional. Additional potential hazards are discussed within the attached "Housing Requirements" document given the character count restrictions in the HEROS. With mitigation, this project is in compliance with Contamination and Toxic Substances Requirements.</p> |
| Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <p>This project has been determined to have No Effect on listed species. A summary of the IPaC database indicates nine endangered, seven threatened, one proposed threatened, and no critical habitats are within the project area. A review of the database and species habitat information indicates no suitable habitat is present for the subject property at this time. The subject property is currently developed with an existing, general contractor for commercial use. As such, there is no potential for disturbance or effect to the</p> |

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| | | <p>listed species. The subject property consists of existing commercial and residential buildings and a parking lot with limited landscaping with plans for redevelopment. The current vegetation of the subject property consists of manicured lawns, hedges, and some trees. A detailed writeup of species habitats and potential to occur on the subject property is attached. Based on the review of USFWS Official Species List of threatened and endangered species, it is Partner's opinion that a No Effect Determination is applicable for the subject property and no additional action is warranted at this time. This project is in compliance with the Endangered Species Act without mitigation.</p> |
| <p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. Based on the site reconnaissance, no existing industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline, diesel fuel of 100-gallons or larger are adjacent to and/or visible from the subject property, including from online satellite imagery (when available). The project is in compliance with explosive and flammable hazard requirements.</p> |
| <p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | <p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property consists of existing commercial and residential buildings with plans for redevelopment as a multi-family facility and because the project does not convert agricultural land to non-agricultural land, the Federal Farmland Protection Policy Act (FPPA) is not triggered. According to the USDA mapped soil information, the onsite soils are rated as "Farmland of</p> |

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| | | statewide importance" and "Prime farmland if irrigated". However, according to the Geography Division, U.S. Census Bureau map, the subject property is located within an urban area. As such, no additional action regarding FPPA is warranted at this time. The project is in compliance with the Farmland Protection Policy Act. |
| Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <p>This project does not occur in the FFRMS floodplain. Partner performed a review of the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency. According to Community Panel Number 06087C0332E, dated May 16, 2012, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property is located in Zone X, an area located outside of the 100-year and 500-year floodplains. No preliminary FEMA FIRM (p-FIRM) are available for the subject property at this time. Additionally, regulatory floodways are not considered a hazard for the subject property, including ingress and egress, at this time. Per Executive Order (EA 11988), no additional action is warranted as the subject property is considered to be a non-critical action site. However, HUD adopted FEMA's Federal Flood Risk Management Standard (FFRMS), which became effective May 23, 2024, with a compliance date of June 24, 2024. (Of note, for FHA and MAP-guide compliant programs / projects, HUD has extended the compliance deadline to Jan. 1, 2025). Per EO 13690 for FFRMS, the following methods were assessed: 1. Climate Informed Science Approach (CISA) - According to FEMA's beta tool, referred to as the Federal Flood Standard Support Tool (FFST), the subject property is located within a FFRMS CISA area. *The beta tool</p> |

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| | | <p>indicated that the proposed action is not located in the FFRMS floodplain. 2. Unshaded Flood Zone X, defined as areas determined to be outside the 0.2% annual chance floodplain (PFA) - Based on the FEMA FIRM, the subject property area is located within the Flood Zone X, unshaded. *The subject property is not located within the 0.2% PFA. 3. Freeboard Value Approach (FVA) - Based on the FEMA FIRM, the subject property is situated approximately 940 feet southeast of the nearest special flood hazard area (SFHA), which is Flood Zone A, and approximately 3,300 feet east of a regulatory floodway. The base flood elevation (BFE) for the SFHA (at Branciforte Creek) is listed at 24 feet and the regulatory floodway is listed at an elevation of 27 feet. Per FFRMS, the 2-foot freeboard approach is added vertically and horizontally to the SFHA/Regulatory Floodway. As such, the FFRMS flood elevation for the SFHA/Regulatory Floodway is 26 feet and 29 feet, respectively. The elevation for the subject property is located at approximately 83 feet. *Based on the FVA information, the subject property is located approximately 54 feet higher than the noted flood areas (SFHA + Regulatory Floodway). The project is in compliance with Executive Orders 11988 and 13690.</p> |
| Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. |
| Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | A Noise Assessment was conducted. The noise level was acceptable: <65.0 db. See noise analysis. A total 10-year day-night sound level (DNL) was |

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| Act of 1978; 24 CFR Part 51 Subpart B | | assessed for the subject property. Partner evaluated roadways with available traffic data within 1,000 feet; railways within 3,000 feet; and airports/military airfields within a 15-mile radius of the subject property. Based on the review of available data, no roadways were identified within 1,000 feet, no railroads were identified within 3,000 feet, and one airport was identified within a 15-mile radius of the subject property. Specific calculations are presented within the attached Noise Assessment prepared by Partner in July 2024. Based on the "Acceptable" projected noise calculations for the year 2034, further action regarding noise at the subject property is not warranted at this time. The project is in compliance with HUD's Noise regulation. |
| Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project is not located on a sole source aquifer area. Based on a review of the Designated Sole Source Aquifers National Map, published by the USEPA, the subject property is not located in a sole source aquifer recharge area. The water supply for the subject property is tied into the public utilities; therefore, it does not impact existing groundwater conditions. The project is in compliance with Sole Source Aquifer requirements. |
| Wetlands Protection Executive Order 11990, particularly sections 2 and 5 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project will not impact on- or off-site wetlands. According to the U.S. Fish & Wildlife Service National Wetlands Inventory website, there are no federally regulated wetlands located on the subject or adjoining property. The project is in compliance with Executive Order 11990. |
| Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is not within proximity of a NWSRS river. The subject property is not located within a one-mile radius of a designated Wild and Scenic River. Therefore, consultation review by the National Park Service is not required. |

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| | | The Wild and Scenic Rivers Act protects selected rivers in a free-flowing condition and prohibits federal support for activities that would harm a designated river's free-flowing condition, water quality or outstanding resource values. The project is in compliance with the Wild and Scenic Rivers Act. |
| HUD HOUSING ENVIRONMENTAL STANDARDS | | |
| ENVIRONMENTAL JUSTICE | | |
| Environmental Justice Executive Order 12898 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | No adverse environmental impacts were identified in the project's total environmental review. The immediate surrounding properties include Vacant land (117 Stanford Avenue) and single-family residences (918-922 North Branciforte Avenue) to the north; Stanford Avenue beyond which is a single-family residence (118 Stanford Avenue), West Bay Tires (1005 Water Street), and Advanced Auto, RPM Auto Repair, Cycle Imagery, and Desert Dream Belly Dance (1025-1031 Water Street) to the east; Water Street beyond which is Branciforte Small Schools Campus (840 North Branciforte Avenue) to the south; and single-family residence (914 North Branciforte Avenue), two commercial buildings (908 North Branciforte Avenue and 911 Water Street), and The Argus Company used car sales (905 Water Street) to the west. These land uses are not expected to have a detrimental environmental impact to the subject property. The proposed activities have no potential to create discrimination or isolation of minority or low-income individuals based on the location of the subject property. Additionally, this project does not create an adverse health or environmental effect that disproportionately impacts minorities of low-income populations. The subject |

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| | | property is not located within an Opportunity Zone. The project is in compliance with Executive Order 12898. |
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

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

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| LAND DEVELOPMENT | | | |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | 2 | The subject property currently consists of 0.582 acres of vacant land improved with five unoccupied buildings. There are currently no onsite operations. Review of engineering/architectural plans indicates the proposed project will alter the existing land form of vacant land with five empty buildings to a multi-family complex that will consist of 85 residential units and interior and exterior community spaces. Green space areas will be incorporated in the project design. The proposed development is similar in nature to the surrounding area, which also consists of multi-family residential areas, single-family and/or commercial areas, and will not be an intrusion of elements out of character or scale with the existing physical environment. The proposed project will consist of the demolition of existing structures and the new construction of a residential structure consisting of 85 | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | affordable low-income housing units. The subject property is designated for Mixed Use High Density development by the Santa Cruz Planning Division (SCPD). According to the listed zoning information, the proposed development at the subject property appears to be of a conforming use. According to historical and current site information, the subject property is considered a suitable area as the subject property has not been utilized as a dump, sanitary landfill, or mine waste disposal area. Furthermore, no unusual conditions were identified at the subject property during the site reconnaissance. The impact on surrounding existing native or non-invasive vegetation and wildlife will be minimal. None of the reasonably foreseeable aspects of the proposed project or future use plans for the site conflict with the community's vision for its future. | |
| Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff | 2 | The 2021 United States Geological Survey (USGS) Santa Cruz, California Quadrangle 7.5-minute series topographic map was reviewed for this project. According to the contour lines on the topographic map, the subject property is located at approximately 85 feet above mean sea level (MSL). The contour lines in the area of the subject property indicate the area is relatively flat with the vicinity sloping to the east-southeast. Based on information obtained from the United States Department of Agriculture (USDA) Natural | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | <p>Resources Conservation Service Web Soil Survey online database, the subject property is mapped 99.2% as Watsonville loam. The Watsonville series consists of deep, somewhat poorly drained soils that formed in alluvium. Watsonville soils are on old coastal terraces and valleys. The remaining 0.8% of soils are mapped as Elder sandy loam. The Elder series consists of very deep and deep, well drained soils that formed in alluvial material derived from mixed rock sources. Elder soils are on alluvial fans and in flood plains. Slopes range from 0 to 2 percent for both soil series. The proposed project would involve grading and earth moving activities and construction of a new multi-family residential complex. Construction would result in the temporary disturbance of soil and would expose disturbed areas to potential storm events. This exposure could generate accelerated runoff, localized erosion, and sedimentation. A site civil engineer/architect will provide slope/erosion/drainage and/or storm water runoff recommendations, if warranted.</p> | |
| Hazards and Nuisances including Site Safety and Site-Generated Noise | 2 | <p>Review of the U.S. Environmental Protection Agency (EPA) Radon Zone Map and county information indicates the subject property is located in radon zone 2. Site Generated Noise: Redevelopment of the subject property will result in short-term noise during the daylight hours. The proposed use of the subject property (residential) upon completion of construction, will not</p> | <p>Per HUD guidelines, radon mitigation activities are required to be implemented during the construction phase of the subject property per CC-1000, 2018 guidelines, Soil Gas Control Systems in New Construction of Buildings. The</p> |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | result in elevated levels of noise. Nuisances: Nuisances that were considered as part of this assessment include gas, smoke, fumes, odors, vibration, glare from lighting from industrial/commercial uses, vacant or boarded up buildings, unsightly land uses, abandoned vehicles, and vermin infestations. No nuisances were identified. | guidelines require soil gas control for all portions of the foundation system and post-construction testing will be required by a licensed, radon professional. Additionally, a Radon Operations and Maintenance Plan must be prepared by the radon mitigation professional upon completion of the mitigation/post-construction testing activities. |
| SOCIOECONOMIC | | | |
| Employment and Income Patterns | 1 | Santa Cruz has a population of 61,400 people on the west coast of central California. The subject property is located in Santa Cruz County. The median household income is \$105,491. The US average is \$74,580 a year. Santa Cruz county has an unemployment rate of 6.7% while the US average is 34.1%. Total employment growth in Santa Cruz County is on at 1.9 percent pace for 2023, and 1.8 percent pace in 2024. Between 2024 and 2028, job growth in Santa Cruz County will average 1.2 percent per year. Please note that above information should be verified with a Market Study, which was not provided for Partner's review. The proposed project includes an increase of 83 residential units to the community and would provide housing opportunities for those working in the community. The proposed | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | project will include a temporary increase during on-site development activities in occupations related to grading, construction, and carpentry. The proposed project will additionally include permanent jobs consisting of leasing office staff, custodial staff, and maintenance staff. As such, the proposed project will include have a minor beneficial impact to employment and income patterns in the community. | |
| Demographic Character Changes / Displacement | 2 | The proposed project would consist of multi-family residential facility, which would provide affordable housing to the surrounding area. The proposed project, as designed, would not result in physical barriers or provide difficult access. No isolation of a neighborhood or group would occur from the proposed development. The proposed project would provide affordable housing for the surrounding area and would not adversely affect low- and moderate-income minority persons or communities more significantly than the general public. The proposed project would not involve indirect displacement. However, the current onsite general contractor tenant would be displaced and would relocate on their own accord. Based on the small quantity of tenants, minimal displacement would occur through the development of the subject property. No indirect or long-term impacts to demographic character or displacement are anticipated with the proposed project. | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| Environmental Justice EA Factor | 2 | The proposed development is not anticipated to negatively impact minority or low income communities, and is considered to have a beneficial impact to low income communities given that the subject property is proposed for development of affordable low-income housing units. No evidence of historical environmental injustices or disproportionate impacts burdening low-income and/or minority persons/communities were identified during the assessment activities. | |
| COMMUNITY FACILITIES AND SERVICES | | | |
| Educational and Cultural Facilities (Access and Capacity) | 2 | The subject property is located within the Santa Cruz City School District. The district is comprised of five elementary schools and two middle schools, three comprehensive high schools, a continuation school, an independent studies program and a homeschool program; five schools are located within a mile of the subject property. Additionally, the subject property is located near, UC Santa Cruz, UC Santa Cruz Coastal, Pacific Collegiate School, Santa Cruz Museum of Art & History, Santa Cruz Museum of Natural History, Steamer Lane lighthouse, others. The additional school-aged children at the proposed project will not exceed the capacity of existing or planned school facilities in the surrounding area. According to the Santa Cruz City School District, open enrollment is available for grade schools, pre-schools, and alternate schools at | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | <p>https://www.sccs.net/enroll. Based on the matrix of units proposed for the subject property, the maximum additional school-aged children at the proposed project would comprise a negligible increase to student enrollment, and not be anticipated to exceed the capacity of existing or planned school facilities in the surrounding area. In addition, based on the proposed residential unit count (83 units), the proposed project will not result in an in an incremental increase in the demand for cultural facilities or require additional/alternative facilities to ensure safety and suitable access to/from educational or cultural facilities. The proposed project is filling a need for additional housing units in the community and will not substantially increase the community's population that would result in crowding of educational or cultural facilities. In summary, this development will have minimal impact on primary and secondary public schools and will not require additional educational or cultural facilities.</p> | |
| Commercial Facilities (Access and Proximity) | 1 | <p>The subject property is located within reasonable distance of services and commercial shopping areas, five grocery stores are located within a one-mile radius of the subject property. The subject property is located within walking distance of a Safeway grocery store and DJ's Market Store. The development of this project is not considered a concern and will not require additional commercial</p> | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
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| | | facilities. The proposed project will have a beneficial impact on neighborhood businesses, the central business district and the regional area. Furthermore, the placing of eligible residents in more affordable housing allows for more disposable income for spending on hard and soft goods. The project will not adversely impact or displace existing retail and commercial services in the surrounding area. | |
| Health Care / Social Services (Access and Capacity) | 2 | The subject property is located within reasonable distance of health care and social services such as Santa Cruz Health Center, Coastsides Family Medicine, Palo Alto Medical Foundation, Doctors on Duty, and others. Additional social services available in the area of the subject property include Youth Services, Mental Health Resource Center, Connections- Santa Cruz, New Life Community Services, Inc- Food Distribution Center, The Salvation Army Santa Cruz Corps Community Center, and others. The proposed project will result in an incremental increase in demand for healthcare and social services that could be accommodated by existing services in the project area. | |
| Solid Waste Disposal and Recycling (Feasibility and Capacity) | 2 | Solid waste generated at the subject property is disposed of in trash cans located on the south side of the subject property. An independent solid waste disposal contractor, City of Santa Cruz, removes solid waste from the subject property. The project development will generate construction debris that will be managed by the development team and disposed offsite in accordance | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|--|--------------------|--|-------------------|
| | | with applicable standards. Upon completion of construction activities, general household solid waste will be generated from the proposed project. Solid waste disposal will be provided by an independent solid waste disposal contractor. The Resource Recovery Facility (RRF) includes a sanitary landfill, recycling center, yard waste drop-off, construction/demolition drop-off, and household hazardous waste drop-off generated within the limits of the City of Santa Cruz. The trash generated at the subject property will likely consist of general refuse including paper, cardboard, cooking waste, and general consumer-use plastic material. As such, the residential use of the subject property is not expected to substantially increase the amount of refuse/trash generated at the subject property and is not expected to materially increase the amount of received by the RRF. | |
| Waste Water and Sanitary Sewers (Feasibility and Capacity) | 2 | Sanitary discharges on the subject property are directed into the municipal sanitary sewer system. The City of Santa Cruz services the subject property vicinity. No wastewater treatment facilities were observed or reported on the subject property. No septic systems were observed or reported on the subject property. No industrial processes are currently performed at the subject property. The new residential structure will result in very minimal impact on the designed capacity of the City of Santa Cruz Water Department | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---|--------------------|---|-------------------|
| | | Treatment Systems. The City of Santa Cruz's wastewater treatment facility has a total capacity to treat of 17 million gallons of water per day. Based on the total number of new units proposed for the subject property (83), the new residential units will result in very minimal impact on the designed capacity of the municipal sanitary sewer system. | |
| Water Supply (Feasibility and Capacity) | 2 | According to available information, a public water system operated by the City of Santa Cruz Water Department serves the subject property vicinity. The sources of public water for the City of Santa Cruz are surface water and groundwater from the San Lorenzo River, the Loch Lomond Reservoir, and North Coast sources Beltz Groundwater Wells located near the City of Live Oak. According to the 2023 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality. The City of Santa Cruz's Graham Hill Water Treatment Plant has capacity to process up to 16 million gallons of water per day, with capacity for 19 million gallons using the reservoir system. Based on the number of new units proposed for this project (83), impacts to water supply are considered to be negligible to the area's overall water supply. As such, no adverse impacts | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|--|--------------------|--|-------------------|
| | | to water supply are anticipated with the proposed project. | |
| Public Safety - Police, Fire and Emergency Medical | 2 | While the addition of residential units will incrementally increase demand on police and fire services, the proposed project is expected to have a nominal increase on the existing public safety resources to the area. Access routes for accessibility for emergency vehicles and compliance with local regulations will be addressed by the civil design team, per city/county building compliance. The project meets the site access requirements for emergency vehicles, including fire truck and ambulance. | |
| Parks, Open Space and Recreation (Access and Capacity) | 2 | Parks, open spaces and recreation areas are within the surrounding area. The following recreational amenities are located within close proximity to the subject property: Grant Park, John Franks Park, Star of the Sea Park, DeLaveaga Park, San Lorenzo Park, Mission Plaza, Jose Avenue County Park, and others. Based on the relatively small number of units proposed and large number of parks in the vicinity of the subject property, the proposed project will not have an adverse effect on passive and active recreational activities to include parks, recreational areas and open spaces within the vicinity of the subject property. | |
| Transportation and Accessibility (Access and Capacity) | 2 | The subject property is accessed via Water Street and Stanford Avenue. The subject property is adjoining to the Water & N Branciforte Ave Bus Stop, connecting the subject property to the larger city of Santa Cruz. San Jose Mineta International | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---------------------------------|-------------|---|------------|
| | | <p>Airport is located approximately 32 miles to the north of the subject property. A bus stop associated with the Santa Cruz Metro is located along Water Street to the south of the subject property, and provides access to various commercial opportunities in the region. Additional transportation opportunities with the Santa Cruz Metro include access to UC Santa Cruz, the Santa Cruz Metro Center, and the Capitola Mall Transit Center. There are multiple sidewalks and crosswalks that provide access for the proposed residents to nearby recreation, commercial, and educational facilities in the surrounding area. The subject property is within an urban area that has multiple opportunities within walking distances. The proposed project will include ample parking spaces for those with vehicles. The expected traffic volume from the proposed project is expected to increase in the immediate area. According to a Trip Generation Analysis prepared by Hexagon Transportation Consultants, Inc., the proposed residential development is estimated to generate 327 new daily trips. Per City of Santa Cruz requirements, a full traffic study is required if a project is expected to generate more than 50 trips during peak hour. The proposed project is estimated to be under this threshold. As such, a transportation study was not completed for this project. The approaches to the</p> | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---|-------------|--|------------|
| | | subject property would be convenient, safe and attractive. | |
| NATURAL FEATURES | | | |
| Unique Natural Features /Water Resources | 2 | No geological features that include rare or special social/cultural, economic, education, aesthetic or scientific value were identified on or abutting the subject property. As such, no adverse impact to unique natural features is considered applicable for the proposed development. The proposed project is not subject to rapid water withdrawal problems that change the depth or character of the water table or aquifer. No septic systems are proposed for the proposed project. No visual or other indications of water quality problems on or near the site were identified. The proposed project will include a stormwater runoff control/design. The proposed project will not involve the discharge of non-sewage pollutants into surface water bodies. Lastly, the proposed project will not limit the access to or quality of water for downstream communities. No watercourses, wetlands, or other water resources are located on adjacent to the subject property. | |
| Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) | 2 | The subject property is an existing, developed commercial area that primarily consists of impervious surfaces. No special-status plants or wildlife were observed during field assessment activities. The proposed project will not damage or destroy plant species that are legally protected by state or local ordinances. Furthermore, the proposed project will not damage or | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---------------------------------|-------------|---|------------|
| | | destroy trees without replacement and landscaping. The development of the subject property will contain pervious (limited) areas that will consist of landscaping and seeding the soil with grass, where applicable. The impact on surrounding existing native or non-invasive vegetation and wildlife will be minimal. None of the reasonably foreseeable aspects of the proposed project or future use plans for the site conflict with the community's vision for its future. | |
| Other Factors 1 | 2 | According to a Natural Hazard Disclosure report prepared for the subject property in January 2022, determinations for natural hazards on the subject property were evaluated through the lens of statutory, County, and City-wide hazards. Additional hazards include statutory disclosures and general advisories. According to the statutory natural hazard determinations, the subject property is not located within a flood hazard area, dam hazard area, very high fire hazard severity area, wildfire area, or fault area. However, per County-level hazard determinations, the subject property is within a mapped area of low potential surface rupture due to faulting, and in an area of moderately low to low liquefaction potential. The county did not consider the subject property to be within an area subjected to landslides, agricultural resources, timber resources, coastal zones, or fire zones. The City hazard analysis | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---------------------------------|-------------|--|------------|
| | | did not consider the subject property to be within an area subjected to tsunami or fire hazard. For natural hazard areas in which the subject property was identified, local building codes for construction safety will be followed to reduce risk. Additional statutory considerations, not including natural hazards, were airport hazards, former military ordinance, airport influence area, and airport noise areas. The subject property was not identified in any additional statutory areas investigated. | |
| Other Factors 2 | 2 | No additional factors of concern or additional information is warranted at this time. | |
| CLIMATE AND ENERGY | | | |
| Climate Change | 2 | According to FEMA's National Risk Index (NRI) online tool, the subject property census tract has an overall "Relatively High" Risk Index when compared to the rest of the U.S. Further analysis is discussed within supporting documentation. | |
| Energy Efficiency | 2 | The subject property will be developed to meet a nationally recognized green building standard. Energy efficient mechanical systems and light fixtures will be used at the site to minimize utility consumption. | |

Supporting documentation

[EA Factors Combined.pdf](#)

Additional Studies Performed:

Phase I Environmental Assessment, prepared by Partner Engineering and Science, Inc, July 2024; Noise Assessment, prepared by Partner Engineering and Science, Inc., July 2024; Trip Generation Analysis for the Proposed Residential Development Located at 917, 919, and 923 Water Street, prepared by Hexagon Transportation Consultants, Inc., September 2022; Cultural Resources Summary Report, prepared by Partner

Engineering and Science, Inc., November 2024; Section 106 Consultation Request - Historic Architecture Assessment, prepared by Partner Engineering and Science, Inc., revised July February 2025; Cultural Resources Monitoring Plan, prepared by Partner Engineering and Science, Inc., February 2025;

Field Inspection [Optional]: Date and completed

by:

Jane Xiao

7/1/2024 12:00:00 AM

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

California Environmental Protection Agency (CalEPA), Santa Cruz County Environmental Health (SCCEH), Santa Cruz Fire Department (SCFD), Monterey Bay Air Resources District (MBARD), Central Coast Regional Water Quality Control Board (RWQCB), California Department of Toxic Substances Control (DTSC), Santa Cruz Building Safety Division (SCBSD), Santa Cruz Planning Division (SCPD), California Geologic Energy Management Division (CalGEM), Santa Cruz County Assessor's Office (SCCAO)

List of Permits Obtained:

Permits, reviews and approvals required for construction activities will be issued by local, city/county and state regulatory agencies with implementation by project contractor and oversight by engineer/architect.

Public Outreach [24 CFR 58.43]:

In the course of conducting this environmental compliance review, any public outreach will be documented in the appropriate review section and uploaded hereto. Upon acceptance by the HUD Certifying Official, the FONSI will be posted on a publicly available website for one year at:
<https://www.hudexchange.info/programs/environmental review/environmental review-records>

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed construction project will not adversely impact the surrounding area. This activity is compatible with the existing uses in the area. There will not be any adverse impact on existing resources or services to the area.

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

The "no action" alternative was considered; however, no action would not meet the demand for additional residential housing for the community. Additionally, the site is already designated for Mixed Use High Density development, which will support the proposed action.

No Action Alternative [24 CFR 58.40(e)]

The project site was thoroughly evaluated for any environmental conditions that might pose a threat, and under certain conditions, it is determined to be appropriate for the proposed project. The environmental review has determined that the development will have a beneficial impact overall on the community.

Summary of Findings and Conclusions:

The project site was thoroughly evaluated for any environmental conditions that might pose a threat, and under certain conditions, it is determined to be appropriate for the proposed project. The environmental review has determined that the development will have a beneficial impact overall on the community.

Mitigation Measures and Conditions [CFR 1505.2(c)]:

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

| Law, Authority, or Factor | Mitigation Measure or Condition | Comments on Completed Measures | Mitigation Plan | Complete |
|---|---|---------------------------------------|--|-----------------|
| Contamination and Toxic Substances | An October 2024 geophysical survey of the subject property did not identify features resembling a UST. In addition, an appropriate vapor barrier design system will be incorporated into the proposed project to minimize any potential vapor impacts from Case#: RO0000421. | N/A | | |
| Hazards and Nuisances including Site Safety and | Per HUD guidelines, radon mitigation activities are required to be implemented during the construction phase | N/A | Completion of a radon survey and Radon | |

| | | | | |
|----------------------|--|--|---|--|
| Site-Generated Noise | of the subject property per CC-1000, 2018 guidelines, Soil Gas Control Systems in New Construction of Buildings. The guidelines require soil gas control for all portions of the foundation system and post-construction testing will be required by a licensed, radon professional. Additionally, a Radon Operations and Maintenance Plan must be prepared by the radon mitigation professional upon completion of the mitigation/post-construction testing activities. | | Operations and Maintenance Plan shall be completed upon completion of the proposed project. | |
|----------------------|--|--|---|--|

Project Mitigation Plan

See mitigation plan.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities**Airport Hazards**

| General policy | Legislation | Regulation |
|---|-------------|--------------------------|
| It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields. | | 24 CFR Part 51 Subpart D |

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

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary**Compliance Determination**

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The nearest airport is the Watsonville Municipal Airport located approximately 15.82 miles to the southeast of the proposed project. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport Map 15000ft radius.pdf](#)

[Airport Map 2500ft radius.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

| General requirements | Legislation | Regulation |
|---|---|------------|
| HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS. | Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501) | |

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Coastal Barrier Map r.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

| General requirements | Legislation | Regulation |
|---|---|---|
| Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained. | Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128) | 24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b). |

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[FEMA map r.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary**Compliance Determination**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). According to Community Panel Number 06087C0332E, dated May 16, 2012, the subject property is not located within a Special Flood Hazard Area (SFHA). Review of the online NFIP information, the city and county are active participants within the NFIP. The community identification numbers are as follows: city CID is 060355F and county CID is 060353F. The project is in compliance with flood insurance requirements.

Supporting documentation

[Community status book report for state CA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

| General requirements | Legislation | Regulation |
|---|---|---------------------------|
| The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP. | Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d)) | 40 CFR Parts 6, 51 and 93 |

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

✓ Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

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

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

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Screen Summary**Compliance Determination**

The project's county or air quality management district is in attainment status for all criteria pollutants. Review of the online EPA air quality information for California through the EPA State Implementation Plan (SIP) indicated the designated areas for SIP requirements does not include the subject property. As such, nonattainment pollutant areas are not considered a concern for the subject property. The project is in compliance with the Clean Air Act.

Supporting documentation

[CA SIP.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

| General requirements | Legislation | Regulation |
|--|--|-----------------|
| Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans. | Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d)) | 15 CFR Part 930 |

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

Yes

☒ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary**Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The state of California does include Coastal Zones which includes properties located within three (3) nautical miles offshore of the Pacific Ocean. Based on the lack of coastal zones identified at the subject property and distance from coast to the subject property, no further assessment regarding Coastal Zones appears warranted at this time. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation[Coastal Zone Map.pdf](#)**Are formal compliance steps or mitigation required?**

Yes

☒ No

Contamination and Toxic Substances

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

1. How was site contamination evaluated?* Select all that apply.

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

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

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

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls**.

An October 2024 geophysical survey of the subject property did not identify features resembling a UST. In addition, an appropriate vapor barrier design

system will be incorporated into the proposed project to minimize any potential vapor impacts from Case#: RO0000421.

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

✓ Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

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

Screen Summary

Compliance Determination

Partner completed a Phase I Environmental Site Assessment completed by Partner on July 15, 2024, a REC was identified. Potential environmental concerns with historical operations include use of the unpaved areas of the subject property as a junk yard for equipment and vehicles from at least 2005 to 2020 and the reported use of a 285-gallon gasoline UST. The UST was reportedly installed in 1968 for use by a mattress factory, located to the north of the current barn structure, and reportedly removed in the early 1990s by the property owner at that time. No documentation pertaining to the removal of the tank or any subsurface investigations during removal was available. A subsurface investigation was conducted at the subject property by AEI Consultants in 2021. 5 exploratory borings were advanced at the property with soil, soil vapor, and grab groundwater samples collected. Arsenic and lead were detected in soil samples exceeding their respective residential and commercial/industrial direct exposure ESLs established by the RWQCB. Benzene and PCE were also detected in soil gas samples at concentrations exceeding their respective residential vapor intrusion ESLs but below their respective commercial/vapor intrusion ESLs. The responsible

parties are identified as David Rasmussen and Trustee Venus B. Rasmussen. This case is also listed as an open cleanup case, identified as Rasmussen Property (917-923 Water Street, Case#: RO0000421) on the RWQCB GeoTracker database with the lead oversight agency listed as SCCEH. Based on the open regulatory status of this case and the proposed redevelopment of the subject property, this release is considered a REC. Partner understands that the applicant will incorporate an appropriate barrier vapor barrier design to minimize any vapor intrusion impacts from the identified contaminants of concern. A Geophysical Investigation Report prepared by Partner in October 2024 was completed to investigate the potential location of on-site USTs, former tank holds, and/or other associated features beneath the subject property. No evidence of existing metallic features resembling a UST was identified within the survey area investigated. Review of the EPA Radon Zone Map and county information indicates the subject property is located within Radon Zone 2. Based on the proposed development activities, radon mitigation is warranted as part of new construction activities. Per HUD guidelines, radon mitigation activities are required to be implemented during the construction phase of the subject property per CC-1000, latest edition, Soil Gas Control Systems in New Construction of Buildings. The guidelines require soil gas control for all portions of the foundation system and post-construction testing will be required by a licensed radon professional. Additional potential hazards are discussed within the attached "Housing Requirements" document given the character count restrictions in the HEROS. With mitigation, this project is in compliance with Contamination and Toxic Substances Requirements.

Supporting documentation

[Phase I Report Water Street Santa Cruz CA 071524.pdf](#)
[Geophysical Investigation Report Water Street Santa Cruz CA 101024.pdf](#)
[Housing Requirements r.pdf](#)
[Pipeline correspondance.pdf](#)
[oil gas well map.pdf](#)
[NPMS map.pdf](#)
[california radon map.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

| General requirements | ESA Legislation | Regulations |
|--|--|-----------------|
| Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”). | The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536). | 50 CFR Part 402 |

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

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

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

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

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

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

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

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

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

No habitat for identified species is on the subject property.
The subject property is an existing, commercial facility.

Screen Summary
Compliance Determination

This project has been determined to have No Effect on listed species. A summary of the IPaC database indicates nine endangered, seven threatened, one proposed threatened, and no critical habitats are within the project area. A review of the database and species habitat information indicates no suitable habitat is present for the subject property at this time. The subject property is currently developed with an existing, general contractor for commercial use. As such, there is no potential for disturbance or effect to the listed species. The subject property consists of existing commercial and residential buildings and a parking lot with limited landscaping with plans for redevelopment. The current vegetation of the subject property consists of manicured lawns, hedges, and some trees. A detailed writeup of species habitats and potential to occur on the subject property is attached. Based on the review of USFWS Official Species List of threatened and endangered species, it is Partner's opinion that a No Effect Determination is applicable for the subject property and no additional action is warranted at this time. This project is in compliance with the Endangered Species Act without mitigation.

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

Yes

✓ No

Explosive and Flammable Hazards

| General requirements | Legislation | Regulation |
|---|-------------|--------------------------|
| HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards. | N/A | 24 CFR Part 51 Subpart C |

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

☒ No

☐ Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

☐ No

☒ Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

☒ No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes

Screen Summary**Compliance Determination**

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. Based on the site reconnaissance, no existing industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline, diesel fuel of 100-gallons or larger are adjacent to and/or visible from the subject property, including from online satellite imagery (when available). The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[Explosives Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

| General requirements | Legislation | Regulation |
|---|--|--------------------------------|
| The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes. | Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) | 7 CFR Part 658 |

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The subject property consists of existing commercial and residential buildings with plans for redevelopment as a multi-family facility.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary**Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property consists of existing commercial and residential buildings with plans for redevelopment as a multi-family facility and because the project does not convert agricultural land to non-agricultural land, the Federal Farmland Protection Policy Act (FPPA) is not triggered. According to the USDA mapped soil information, the onsite soils are rated as "Farmland of statewide importance" and "Prime farmland if irrigated". However, according to the Geography Division, U.S. Census Bureau map, the subject property is located within an urban area. As such, no additional action regarding FPPA is warranted at this time. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Urban Areas Map r.pdf](#)

[Farmland Classification Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

| General Requirements | Legislation | Regulation |
|---|--|------------|
| Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. | Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046 | 24 CFR 55 |

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

✓ No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

✓ No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. Partner performed a review of the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency. According to Community Panel Number 06087C0332E, dated May 16, 2012, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property is located in Zone X, an area located outside of the 100-year and 500-year floodplains. No preliminary FEMA FIRM (p-FIRM) are available for the subject property at this time. Additionally, regulatory floodways are not considered a hazard for the subject property, including ingress and egress, at this time. Per Executive Order (EA 11988), no additional action is warranted as the subject property is considered to be a non-critical action site. However, HUD adopted FEMA's Federal Flood Risk Management Standard (FFRMS), which became effective May 23, 2024, with a compliance date of June 24, 2024. (Of note, for FHA and MAP-guide compliant programs / projects, HUD has extended the compliance deadline to Jan. 1, 2025). Per EO 13690 for FFRMS, the following methods were assessed: 1. Climate Informed Science Approach (CISA) - According to FEMA's beta tool, referred to as the Federal Flood Standard Support Tool (FFST), the subject property is located within a FFRMS CISA area. *The beta tool indicated that the proposed action is not located in the FFRMS floodplain. 2. Unshaded Flood Zone X, defined as areas determined to be outside the 0.2% annual chance floodplain (PFA) - Based on the FEMA FIRM, the subject property area is located within the Flood Zone X, unshaded. *The subject property is not located within the 0.2% PFA. 3. Freeboard Value Approach (FVA) - Based on the FEMA FIRM, the subject property is situated approximately 940 feet southeast of the nearest special flood hazard area (SFHA), which is Flood Zone A, and approximately 3,300 feet east of a regulatory floodway. The base flood elevation (BFE) for the SFHA (at Branciforte Creek) is listed at 24 feet and the regulatory floodway is listed at an elevation of 27 feet. Per FFRMS, the 2-feet freeboard approach is added vertically and horizontally to the SFHA/Regulatory Floodway. As such, the FFRMS flood elevation for the SFHA/Regulatory Floodway is 26 feet and 29 feet, respectively. The elevation for the subject property is located at approximately 83 feet. *Based on the FVA information, the subject property is located approximately 54 feet higher than the noted flood areas (SFHA + Regulatory Floodway). The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[No pFIRM snipit.pdf](#)

[FFRMS Freeboard Value Approach Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

| General requirements | Legislation | Regulation |
|---|--|---|
| Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects | Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) | 36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf |

Threshold**Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

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

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation**Select all consulting parties below (check all that apply):**

- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

Describe the process of selecting consulting parties and initiating consultation here:

Based on the project's scope of work, consultation with the SHPO was commenced for the proposed project. No federally-recognized tribes were identified for the County of Santa Cruz.

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:

917,919 & 923 Water Street, SANTA CRUZ, CA, 95062

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

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

| Address / Location / District | National Register Status | SHPO Concurrence | Sensitive Information |
|----------------------------------|-----------------------------|------------------|--------------------------|
|----------------------------------|-----------------------------|------------------|--------------------------|

Additional Notes:

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

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

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

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

No Historic Properties Affected

✓ No Adverse Effect

Based on the response, the review is in compliance with this section.

Document reason for finding:

See correspondences, Cultural Resources (attached to final SHPO letter) Report, and Cultural Resources Monitoring Plan that are uploaded herein. This finding was selected based on the no response finding from the SHPO within the mandatory 30-day response timeframe.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

✓ No

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Adverse Effect

Screen Summary**Compliance Determination**

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

[Cultural Resources Monitoring Plan Water Street Santa Cruz CA 022825.pdf](#)

[5 second Partner response to SHPO.pdf](#)

[4 second response from SHPO.pdf](#)

[3 Partner response to SHPO.pdf](#)

[2 response from SHPO.pdf](#)

[1 SHPO Consultation Request Final 917 923 Water Street.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

| General requirements | Legislation | Regulation |
|---|--|------------------------------|
| HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate. | Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields" | Title 24 CFR 51 Subpart B |

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

- ✓ New construction for residential use

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

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

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

Indicate the findings of the Preliminary Screening below:

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

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

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

Indicate noise level here: 65

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 65

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was acceptable: <65.0 db. See noise analysis. A total 10-year day-night sound level (DNL) was assessed for the subject property. Partner evaluated roadways with available traffic data within 1,000 feet; railways within 3,000 feet; and airports/military airfields within a 15-mile radius of the subject property. Based on the review of available data, no roadways were identified within 1,000 feet, no railroads were identified within 3,000 feet, and one airport was identified within a 15-mile radius of the subject property. Specific

calculations are presented within the attached Noise Assessment prepared by Partner in July 2024. Based on the "Acceptable" projected noise calculations for the year 2034, further action regarding noise at the subject property is not warranted at this time. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[0 Noise Assessment Water Street Santa Cruz California 95062 07162024.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

| General requirements | Legislation | Regulation |
|--|--|-----------------|
| The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health. | Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349) | 40 CFR Part 149 |

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary**Compliance Determination**

The project is not located on a sole source aquifer area. Based on a review of the Designated Sole Source Aquifers National Map, published by the USEPA, the subject property is not located in a sole source aquifer recharge area. The water supply for the subject property is tied into the public utilities; therefore, it does not impact

existing groundwater conditions. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifer Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

| General requirements | Legislation | Regulation |
|---|-----------------------|---|
| Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed. | Executive Order 11990 | 24 CFR 55.20 can be used for general guidance regarding the 8 Step Process. |

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. According to the U.S. Fish & Wildlife Service National Wetlands Inventory website, there are no federally regulated wetlands located on the subject or adjoining property. The project is in compliance with Executive Order 11990.

Supporting documentation

[wetlands map r.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

| General requirements | Legislation | Regulation |
|---|---|-----------------|
| The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development. | The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c)) | 36 CFR Part 297 |

1. Is your project within proximity of a NWSRS river?

✓ No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

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

Screen Summary**Compliance Determination**

This project is not within proximity of a NWSRS river. The subject property is not located within a one-mile radius of a designated Wild and Scenic River. Therefore, consultation review by the National Park Service is not required. The Wild and Scenic Rivers Act protects selected rivers in a free-flowing condition and prohibits federal support for activities that would harm a designated river's free-flowing condition, water quality or outstanding resource values. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Wild Scenic River map.pdf](#)

[Study River List 2022.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

| General requirements | Legislation | Regulation |
|--|-----------------------|------------|
| Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project. | Executive Order 12898 | |

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

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

Yes

✓ No

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The immediate surrounding properties include Vacant land (117 Stanford Avenue) and single-family residences (918-922 North Branciforte Avenue) to the north; Stanford Avenue beyond which is a single-family residence (118 Stanford Avenue), West Bay Tires (1005 Water Street), and Advanced Auto, RPM Auto Repair, Cycle Imagery, and Desert Dream Belly Dance (1025-1031 Water Street) to the east; Water Street beyond which is Branciforte Small Schools Campus (840 North Branciforte Avenue) to the south; and single-family residence (914 North Branciforte Avenue), two commercial buildings (908 North Branciforte Avenue and 911 Water Street), and The Argus Company used car sales (905 Water Street) to the west. These land uses are not expected to have a detrimental environmental impact to the subject property. The proposed activities have no potential to create discrimination or isolation of minority or low-income individuals based on the location of the subject property. Additionally, this project does not create an adverse health or environmental effect that disproportionately impacts minorities of low-income

populations. The subject property is not located within an Opportunity Zone. The project is in compliance with Executive Order 12898.

Supporting documentation

[Opportunity Zones Map.pdf](#)

[EJScreen Community Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Water-Street

HEROS Number: 900000010410370

Start Date: 07/09/2024

Project Location: 917, 919, 923 Water St, Santa Cruz, CA 95062

Additional Location Information:

The subject property is located on the northwest corner of the Water Street and Stanford Avenue intersection within a residential and commercial area of Santa Cruz. The immediate surrounding properties include Vacant land (117 Stanford Avenue) and single-family residences (918-922 North Branciforte Avenue) to the north; Stanford Avenue beyond which is a single-family residence (118 Stanford Avenue), West Bay Tires (1005 Water Street), and Advanced Auto, RPM Auto Repair, Cycle Imagery, and Desert Dream Belly Dance (1025-1031 Water Street) to the east; Water Street beyond which is Branciforte Small Schools Campus (840 North Branciforte Avenue) to the south; and single-family residence (914 North Branciforte Avenue), two commercial buildings (908 North Branciforte Avenue and 911 Water Street), and The Argus Company used car sales (905 Water Street) to the west.

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

The subject property is currently vacant land improved with unoccupied structures. Currently, there are no onsite operations. The subject property consists of three one-story commercial buildings located on the southwest and east sides of the property and one two-story residential building with an associated one-story barn located on the south/central portion of the property. In addition to the current structures, the subject property is also improved with concrete-paved yard areas on the west side and perimeter fencing. The subject property is proposed to receive financing via 25 Project Based Vouchers through the City of Santa Cruz. The proposed project will include the demolition of the existing structures and the new construction of a residential structure consisting of 83 affordable low-income housing units consisting of 34 one-bedroom units, 24 two-bedroom units, and 25 three-bedroom units. A Phase I Environmental Site Assessment was completed for the subject property on July 15, 2024. This assessment has revealed no evidence of controlled recognized environmental conditions (CRECs) or historical recognized environmental conditions (HRECs) in connection with the subject property; however, a recognized environmental condition (REC) was identified, and recommendations are provided. Further discussion on this REC is provided in the Contamination and Toxic Substances Section of this report.

Funding Information

| Grant Number | HUD Program | Program Name | |
|--------------|----------------|-------------------------------|----------------|
| # | Public Housing | Project-Based Voucher Program | \$5,852,615.00 |

Estimated Total HUD Funded Amount: \$5,852,615.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$43,160,000.00

Mitigation Measures and Conditions [CFR 1505.2(c)]:

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

| Law, Authority, or Factor | Mitigation Measure or Condition |
|--|---|
| Contamination and Toxic Substances | An October 2024 geophysical survey of the subject property did not identify features resembling a UST. In addition, an appropriate vapor barrier design system will be incorporated into the proposed project to minimize any potential vapor impacts from Case#: RO0000421. |
| Hazards and Nuisances including Site Safety and Site-Generated Noise | Per HUD guidelines, radon mitigation activities are required to be implemented during the construction phase of the subject property per CC-1000, 2018 guidelines, Soil Gas Control Systems in New Construction of Buildings. The guidelines require soil gas control for all portions of the foundation system and post-construction testing will be required by a licensed, radon professional. Additionally, a Radon Operations and Maintenance Plan must be prepared by the radon mitigation professional upon completion of the mitigation/post-construction testing activities. |
| Permits, reviews, and approvals | Permits, reviews and approvals required for construction activities will be issued by local, city/county and state regulatory agencies with implementation by project contractor and oversight by engineer/architect. |

Project Mitigation Plan

See mitigation plan.

Determination:

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment |
| <input type="checkbox"/> | Finding of Significant Impact |

Preparer Signature:  Date: 3/18/2025

Name / Title/ Organization: Jessie Bristow / / SANTA CRUZ

Certifying Officer Signature:  Date: 3/18/2025

Name/ Title: Jessie Bristow / Development Manager

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