U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
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Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Cabrillo College Student Housing Project

Responsible Entity: Santa Cruz County

Grant Recipient (if different than Responsible Entity): Cabrillo Community College District

State/Local Identifier: California

Preparer: Environmental Science Associates

Certifying Officer Name and Title: Stephanie Hansen, Assistant Director, Santa Cruz County Community Development and Infrastructure

Grant Recipient (if different than Responsible Entity): Cabrillo Community College District

Consultant (if applicable): Environmental Science Associates

Direct Comments to: Regina Ip, Director of Marketing and Communications, Cabrillo Community College District, 6500 Soquel Dr, Aptos, CA 95003. Comments may also be submitted online at the following link: https://forms.gle/D5ktop6JUMYkbvc47

Project Location: The main Cabrillo College campus is located north of State Route 1 (SR-1) in the unincorporated community of Aptos in Santa Cruz County. The proposed student housing project (proposed project) would be located on an approximately 3.6-acre site located in the southwestern portion of campus (APN- 039-141-06).

Description of the Proposed Project [24 CFR 50.12 & 58.32]: Cabrillo College proposes to construct and operate a four-story housing facility providing up to 246 units and 686 beds providing affordable housing options for students from the College and the University of California, Santa Cruz (UCSC). The four-story structure would be approximately 50 feet in height and include up to 250,000 gross square feet of building space. Approximately 60 percent of beds would be reserved for existing Cabrillo College students while the remaining approximately 40 percent of beds would be reserved for UCSC students. The proposed project would house up to 686 people, which equals the maximum number of beds.

The proposed project also includes a childcare center within the proposed housing structure. The proposed childcare center would include 5,800 gross square feet of building space and would serve up to 64 children. The childcare center would serve both residents and non-residents.

Finally, the proposed project would involve the relocation of Delta High School, currently housed in a portable building adjacent to Parking Lot S, to the eastern half of Building 500 on the northern portion of campus. The existing sheriff's substation, housed in a portable building immediately east of Parking Lot S, would also be relocated to another building on campus as part of the project with one option being the portable building currently housing Delta High School. The portable building that is currently housing the sheriff's substation would be removed and disposed of off campus.

Project construction is anticipated to occur over a 22-month period beginning in fall 2025 and ending in summer 2027, with occupancy commencing in fall 2027. Construction would typically take place Monday through Friday with some weekend work required. Typical construction hours would extend from early morning through mid-afternoon, in compliance with local construction hour regulations.

Construction activities would include site grading and excavation, utility trenching, building foundation pouring, and building construction. Pile driving may be required. Typical construction equipment would include dozers, excavators, loaders/backhoes, paving equipment, forklifts, and haul trucks. Because the proposed project would disturb more than one acre of land, it would be required to obtain coverage under the State Water Resources Control Board Construction General Permit (Order WQ 2022-0057-DWQ, NPDES Permit No. CAS000002), which requires development and implementation of a stormwater pollution prevention plan (SWPPP) that includes best management practices (BMPs) such as perimeter controls, slope stabilization, and material handling protocols to minimize erosion and sedimentation.

In accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines, Cabrillo College prepared an Addendum to the previously certified Cabrillo College 1999 Facilities Master Plan Final Environmental Impact Report (1999 Master Plan EIR) (State Clearinghouse [SCH] # 99072117) that analyzes potential environmental impacts that could result from a proposed amendment to the Cabrillo College 1999 Master Plan that would allow the implementation of the proposed project. The Addendum concluded that there is no substantial change proposed that would require major revisions to the previous Cabrillo College 1999 Master Plan Final EIR and that none of the conditions described in Section 15162 of the CEQA Guidelines that call for the preparation of a subsequent EIR would apply. The information contained within the Addendum forms the basis for much of the information in this Environmental Assessment (EA), which has been prepared to support the proposed project's compliance with the National Environmental Policy Act (NEPA) and related laws and authorities pursuant to 24 (Code of Federal Regulations [CFR]) Part 58.

Statement of Purpose and Need for the Proposal: The purpose of the proposed project is to develop a facility to provide affordable housing options for students from Cabrillo College and UCSC that includes an on-campus childcare center to provide accessible, affordable childcare services for student-parents, faculty, and staff.

The need for the project arises from the college's lack of adequate affordable housing options for students and on-site childcare facilities, which presents a barrier to educational attainment and workforce participation for student-parents. Providing affordable housing and childcare facilities on campus would address a critical service gap, help retain low-income and nontraditional students and contribute to educational equity. The proposed project is consistent with federal goals under the U.S. Department of Housing and Urban Development (HUD) funding program to support infrastructure and services that increase access and opportunity for underserved communities.

In 2024, Cabrillo College received approval for HUD funding to construct the childcare center portion of the project. As the proposed childcare center does not have a separate utility from the overall student housing project, this EA evaluates the potential environmental effects of the entire project.

Existing Conditions and Trends [24 CFR 58.40(a)]: The project site is located within an existing community college campus in the unincorporated community of Aptos, Santa Cruz County. The approximately 3.6-acre student housing project site is currently used as a grass-covered athletic field and is surrounded by campus infrastructure, including parking lots, athletic facilities, portable educational buildings, and roadways. The area is flat, developed, and served by existing utilities and public infrastructure.

The surrounding community includes residential neighborhoods, commercial areas, public facilities, and religious institutions. The Cabrillo College campus itself includes academic, administrative, and support buildings as well as Delta High School and a sheriff's substation.

In recent years, there has been growing demand for on-campus student housing services that support student success, particularly among student-parents and low-income enrollees. Cabrillo College has identified the need for expanded student housing and childcare facilities as part of its strategic planning efforts to promote educational access and retention. The proposed project responds to these trends by providing student housing and childcare facilities on campus. This development would align with local and institutional goals to serve disadvantaged populations and reduce barriers to higher education.

Funding Information

Grant Number	HUD Program	Funding Amount
B-24-CP-CA-0290	14.251 Economic Development Initiative, Community Project Funding, and Miscellaneous Grants	$1,666,279

Estimated Total HUD Funded Amount: $1,666,279

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:** $5,000,000

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes ☐ No ☒	HUD guidance regarding compliance with 24 CFR 51 D states that additional information is necessary if a project site is within 15,000 feet of a military airport or 2,500 feet of a civilian airport.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		The nearest civilian airport to Cabrillo College is Watsonville Municipal Airport, located approximately 8.3 miles southeast of the Cabrillo College campus. The nearest military-affiliated airfield to Cabrillo College is Moffett Federal Airfield (NUQ), a joint civil–military facility near Mountain View and Sunnyvale—about 40 miles north of Aptos. The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport and no further information is necessary per HUD Guidance. Source Document(s): 1
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	There are no Coastal Barrier Resource System (CBRS) Units, or CBRS buffer zones, as defined under the Coastal Barrier Resources Act of 1982 (PL 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (PL 101-591) on the west coast of the United States. The project site is therefore not located within a CBRS Unit, or a CBRS buffer zone. Source Document(s): 2
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes ☐ No ☒	The project is not located in a FEMA-designated Special Flood Hazard Area. Source Document(s): 3
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☒	The project site is in the unincorporated community of Aptos in Santa Cruz County, within the North Central Coast Air Basin (NCCAB). The region is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). Although the NCCAB is designated as a maintenance area for the federal 1-hour ozone standard, it is currently in attainment for all other National Ambient Air Quality Standards (NAAQS). A technical air quality analysis was conducted to determine whether the project's emissions would exceed federal de minimis thresholds and trigger a conformity determination.

<table>
<tr><th>**Compliance Factors**: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th><th>**Are formal compliance steps or mitigation required?**</th><th>**Compliance determinations**</th></tr>
<tr><td></td><td></td><td>Estimated emissions from project construction and operation were modeled using CalEEMod. The analysis demonstrated that emissions of all criteria pollutants, including ozone precursors (ROG/VOC and NOx), carbon monoxide (CO), sulfur oxides (SOx), particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$), would be well below the federal *de minimis* thresholds. Therefore, the project is not subject to a conformity determination under the Clean Air Act.
<table>
<tr><th rowspan="2">Activity</th><th colspan="6">Maximum Emissions (Tons/Year)</th></tr>
<tr><th>CO</th><th>NO_X</th><th>ROG</th><th>SO_X</th><th>PM_{10}</th><th>$PM_{2.5}$</th></tr>
<tr><td>Construction Emissions</td><td>2.43</td><td>1.41</td><td>3.65</td><td><0.01</td><td>0.22</td><td>0.09</td></tr>
<tr><td>Operational Emissions</td><td>14.0</td><td>1.46</td><td>3.50</td><td>0.02</td><td>1.71</td><td>0.45</td></tr>
<tr><td>De Minimis</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td></tr>
<tr><td>Significant (Yes or No)</td><td>**No**</td><td>**No**</td><td>**No**</td><td>**No**</td><td>**No**</td><td>**No**</td></tr>
</table>
Source Document(s): 4</td></tr>
<tr><td>**Coastal Zone Management**
Coastal Zone Management Act, sections 307(c) & (d)</td><td>Yes ☐ No ☒</td><td>The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act. Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the act.
California’s coastal zone generally extends 1,000 yards inland from the mean high tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to the first major ridgeline or 5 miles from the mean high tide line, whichever is less.
The project site is not within the coastal zone and does not involve the placement, erection, or removal of materials, or an increase in the intensity of use, in the coastal zone.
Source Document(s): 5</td></tr>
</table>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☐ No ☒	Based on the Phase I Environmental Site Assessment and supplemental subsurface investigation prepared by Ramboll, there is no evidence of contamination or toxic substances on the project site. The site is currently a recreational sports field, and historical land uses do not indicate prior development or hazardous activity. Subsurface soil and vapor testing detected no evidence of contamination that would pose a health risk or require remediation. Based on the subsurface investigation report, low levels of petroleum-related volatile organic compounds (VOCs) were detected in soil vapor samples but did not exceed residential screening criteria for newly constructed buildings. Arsenic was present at levels consistent with natural background concentrations in California soils. No chlorinated solvents or polychlorinated biphenyls (PCBs) were detected. No recognized environmental conditions (RECs) were identified. The site is not located on or adjacent to a Superfund site, active cleanup site, or hazardous materials release area listed in the State Water Resources Control Board's GeoTracker database or the Department of Toxic Substances Control's EnviroStor database. Construction and operation of the proposed project would involve the routine use of small quantities of hazardous materials (e.g., fuels, paints, cleaning agents) but these activities would be conducted in compliance with all applicable local, state, and federal regulations. No unusually hazardous substances would be used or stored on site, and no adverse impacts on human health or the environment are anticipated. Source Document(s): 6, Attachment 1 and Attachment 2
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes ☒ No ☐	A reconnaissance-level biological survey of the project site was conducted on April 11, 2024. Additional desktop review included data from the California Natural Diversity Database (CNDDB), U.S. Fish and Wildlife Service (USFWS) IPaC

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		system, and the California Native Plant Society (CNPS). The Cabrillo College campus is located in a developed area with primarily disturbed habitat. The proposed project would be constructed on a flat, previously disturbed athletic field with limited potential for supporting federally listed species. The California red-legged frog (*Rana draytonii*), a federally listed species, was historically identified in the area but is now considered to have a low potential to occur on or near the project site due to land use changes leading to the lack of suitable aquatic habitat and barriers to dispersal (project is outside the dispersal distance [>2 miles] from the nearest historical [1991] occurrence). No suitable habitat for federally listed plant species was identified during the site survey. The monarch butterfly (*Danaus plexippus plexippus*) is a federal candidate species, and suitable overwintering and foraging habitat may be present within and near the project site. Although candidate species are not subject to formal Section 7 consultation, USFWS encourages voluntary conservation measures. Because of this, the project shall implement mitigation measures identified in the Mitigation Measures and Conditions section below. The project incorporates pre-construction surveys and worker awareness training as part of its mitigation strategy. These measures would ensure that, should the monarch be formally listed in the future, impacts would remain less than significant. Based on the habitat conditions and species assessments, and with the incorporation of project mitigation measures, the project would not affect federally listed threatened or endangered species, and no consultation with USFWS under Section 7 is required. Source Document(s): 7 and 8

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	The project does not involve the development or storage of explosive or flammable substances. Based on the Phase I Environmental Site Assessment and supplemental subsurface investigation prepared by Ramboll, there are no known aboveground storage tanks (ASTs) containing gasoline, diesel, or other flammable materials above regulatory threshold quantities on or adjacent to the project site. Soil and soil vapor sampling did not indicate the presence of petroleum-related contamination, and no visual or olfactory evidence of hazardous materials was observed during field investigations. Surrounding land uses are institutional, residential, and commercial, and there are no industrial operations or bulk fuel storage facilities nearby that would require an Acceptable Separation Distance (ASD) analysis under HUD regulations. Hazardous materials use on campus is limited to minor quantities of maintenance-related substances, which do not present a risk of explosion or flammability. Source Document(s): Attachment 1 and 2
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☒	Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a non-agricultural use. The project site and surrounding area is designated as Urban and Built Up Land by the California Department of Conservation. The project site is not on or adjacent to prime or unique farmland, or other farmland of statewide or local importance as identified by the U.S. Department of Agriculture, Natural Resources Conservation Service. Source Document(s): 9
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☐ No ☒	The project is not located in a FEMA-designated Special Flood Hazard Area. Source Document(s): 3

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☒ No ☐	An ESA archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (62 Federal Register 33708-33723) prepared a cultural resources assessment for the project, which included archival research and a pedestrian survey to identify cultural resources within the project's Area of Potential Effects (APE). In summary, background research, literature review, and pedestrian survey did not identify any cultural resources in the APE. Based on the results of the cultural resources assessment, there is a low potential that cultural materials will be encountered during ground-disturbing activities associated with project construction. Therefore, a finding of No Historic Properties Affected is proposed for the project. While no pre-contact or historic-era cultural resources were identified, the inadvertent discovery of buried cultural materials and human remains cannot be entirely discounted due to ground disturbance. Because of this, the project shall implement mitigation measures identified in the Mitigation Measures and Conditions section below. Source Document(s): 10
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☒ No ☐	<u>*Roadways*</u> The Santa Cruz County General Plan identifies that highways such as SR-1 and certain local roads such as Soquel Drive are major sources of noise in the county. Cabrillo College is generally bordered by both Soquel Drive (to the north) and SR-1 (to the south). The proposed facilities would be located on the southern end of the college site, adjacent to SR-1, but more than ¼ mile (1,250 feet) from Soquel Drive. Ambient noise monitoring conducted at the site 180 feet from the centerline of SR-1 measured a weekday daytime (7 a.m. to 10 p.m.) average noise level of 67 dBA Leq and a nighttime (10 p.m. to 7 a.m.) average noise level of 63 dBA Leq; the overall calculated day-night noise level (DNL) was 71 dBA. DNL is a 24-hour average noise level with a 10 dBA penalty for noise occurring during

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		the nighttime hours to account for increased sensitivity to noise during this period. Short-term monitoring near the closest sensitive receptor location – the Twin Lakes Church, Christian School, and Children's Enrichment Center located east of the project site – measured a daytime noise level of 64 dBA Leq. *HUD Noise Standards* The acceptable exterior noise level set forth by HUD regulations for new construction of housing is 65 dBA DNL or less. The regulations consider the range between 65 dBA DNL and 75 dBA DNL to be normally unacceptable and require the incorporation of sound attenuation measures to provide a minimum 5 dBA and 10 dBA of exterior-to-interior noise reduction when exterior noise levels exceed 65 DNL and 70 DNL, respectively. A DNL greater than 75 dBA is considered unacceptable. HUD also establishes an interior noise goal of 45 dBA DNL or less. The HUD DNL Calculator is an assessment tool that calculates the DNL from roadway and railway traffic, as well as from aircraft and loud impulse sounds. ESA modeled noise levels at the project site using the HUD DNL Calculator, which requires assessing noise impacts from roadways up to 1,000 feet away and railways up to 3,000 feet away that could potentially affect noise at the project site. The arterial roadways within 1,000 feet of the project site are limited to SR-1. Existing car, medium truck (2-axle), and heavy-duty truck (3- or more axles) traffic volumes for this roadway were obtained from Caltrans traffic count data for year 2023. The exterior façade of the proposed student housing building would range from 150 feet (at closest) to 180 feet (at farthest) from the centerline of SR-1. The HUD DNL calculator estimates SR-1 noise levels to be 74 DNL at 150 feet and 73 DNL at 180 feet from the highway center. The difference between the field-measurement based DNL (71 dBA) and the HUD Calculator DNL (73 dBA) is due to the fact that the HUD Calculator cannot account for the proposed building being situated

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		at a grade that is approximately 20 feet higher than the SR-1 surface. This sloping elevation difference provides approximately 2 dBA of attenuation of SR-1 traffic noise levels at the project site. Traffic volumes and related noise levels on SR-1 are not expected to substantially change in the future as highway volumes are already at or close to levels that limit the free flow of traffic. There are no passenger or freight rail lines located within 3,000 feet of the project site. There are three airports located within the preliminary 15-mile screening distance from the project site. The Monterey Bay Academy Airport and the Watsonville Municipal Airport are located approximately 7.2 miles and 8.3 miles to the southeast of the project site, respectively. The private Bonny Doon Airport is located approximately 12.6 miles to the northwest. The project site is located several miles outside of the 60 dBA and 65 dBA Community Noise Equivalent Level (CNEL) noise contours for Watsonville Municipal Airport; Monterey Bay Academy and Bonny Doon airports do not have published noise contour information but are low volume and private airports, respectively, that do not generate substantial aircraft-related noise levels. Consequently, the contribution of airport noise would not materially contribute to the noise environment at the project site and was not included in the HUD DNL Calculator assessment. As described above, the exterior noise level at the project site is primarily influenced by traffic on SR-1, which is assumed to range between 71 to 72 DNL based on field measurements. This noise exposure level falls within HUD's normally unacceptable range, which is more than 65 dBA DNL, and requires the incorporation of noise design features capable of providing an exterior-to-interior noise reduction of 27 dBA to achieve compliance with the HUD goal and State-required interior noise level of 45 dBA DNL. Title 24 of the California Code of Regulations, Part 2, California Building Code, Section 1206,

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		Sound Transmission, establishes standards for interior walls, partitions and floor/ceiling assemblies intended to minimize airborne and structure-borne sound transmission between adjacent dwelling units and sleeping units and sleeping units and adjacent public areas. Specifically, the code establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 DNL in spaces for living, sleeping, eating, or cooking. In addition, Part 11, the California Green Building Standards, establishes acoustic control requirements for non-residential buildings that are located within a 65 CNEL contour or otherwise exposed to an hourly noise level of 65 dBA Leq to include measures to achieve an interior noise level of 50 dBA Leq. The Cabrillo Community College District shall prepare final design plans and incorporate building design and acoustical treatments to ensure compliance with state building codes and County noise standards. A project-specific acoustical analysis shall be prepared to ensure that the design incorporates controls to reduce interior noise levels to 45 dBA Ldn or lower within the residential units. The project applicant shall conform with any special building construction techniques requested by the Division of the State Architect, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking. *Construction Noise* Construction of the proposed project would occur over a period of approximately 22 months, starting in fall 2025 and concluding during summer 2027. Project construction would result in temporary increases in ambient noise levels. Onsite construction activities would require the use of heavy construction equipment (e.g., excavator, loader, crane, pile driver) that would generate varying noise levels. Offsite construction noise sources would consist of passing trucks and other construction-related vehicles. The closest residences to the project site are located to the east (on Estates Drive) and west

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		(on Rosemary Court) of the college campus, more than 840 feet away from potential construction work zones. Similarly, the closest student receptors would be located in Building 500, which is more than 1,000 feet away from potential work zones. The closest noise-sensitive receptors to the project site are the Twin Lakes Church, Christian School, and Children's Enrichment Center, which are approximately 500 feet west of the center of the project site. Consistent with the Federal Transit Administration's (FTA) general construction assessment methodology, the two noisiest pieces of equipment associated with typical project construction activities (grader and dozer) were assumed to operate simultaneously and modeled using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). As estimated using the RCNM, worst-case construction noise levels at the Twin Lakes facilities would be 63 dBA Leq, which is approximately 1 dBA less than short-term noise levels measured near the center of the Twin Lakes facilities (approximately 750 feet from the center of SR-1), and 4 dBA less than the daytime average noise level measured near the southern end of the Twin Lakes facilities (180 feet from the center of SR-1). The use of typical construction equipment would generate noise levels substantially less than the FTA's 90 dBA construction noise criterion for general assessments. Therefore, typical construction activities would not result in substantial temporary construction noise levels. Although not anticipated, the use of pile driving equipment cannot be ruled out with certainty at this time. If pile driving equipment were used, noise levels at the Twin Lakes facilities could reach 74 dBA Leq, which would be approximately 7 dBA to 10 dBA above existing ambient noise levels. Pile driving noise levels would remain substantially less than the FTA's 90 dBA construction noise criterion for general assessments. Therefore, pile driving activities

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		would not result in substantial temporary construction noise levels. All project construction activities would implement noise control measures that were identified and adopted as part of the 1999 Cabrillo College Master Plan. These measures include: (1) limiting construction activity to the hours of 8:00 a.m. to 6:00 p.m. on weekdays, 9:00 a.m. to 5:00 p.m. on Saturday, and no construction on Sundays or public (State-observed) holidays, (2) implementing appropriate noise reduction measures that include changing the location of stationary construction equipment, shutting off idling equipment, notifying adjacent residences in advance of construction work, and installing temporary acoustic barriers around stationary construction noise sources when construction operations occur adjacent to occupied residential areas, the Twin Lakes Church, or campus academic or administrative facilities, and (3), temporarily relocating classes to a different location on campus if construction activities would occur for an extended period of time adjacent to classrooms. As summarized above, typical construction activities (i.e., without pile driving) would generate noise levels that are similar to or less than existing ambient noise environment and therefore, would not be expected to result in more than a 3 dBA increase in ambient noise levels at the closest sensitive receptors (the Twin Lakes facilities). The use of pile driving would result in noise levels that could be approximately 8 dBA to 10 dBA above ambient conditions; however, if this activity were to occur, it would occur during the daytime. Furthermore, when pile driving occurs adjacent to the Twin Lakes facilities, noise reduction measures would be implemented, such as a temporary construction barrier, that would provide at least 5 dBA of noise reduction. With these measures, pile driving activities would only result in up to a 5 dBA temporary change in the ambient noise environment during daytime hours only. Finally, at no time would pile driving noise levels exceed

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		the FTA's general construction assessment daytime noise criterion of 90 dBA Leq. For these reasons, the proposed project would not result in substantial temporary construction noise levels. <u>*Operational Noise*</u> The proposed project would generate noise from both on- and off-site sources and activities. Residential-type land uses are generally not considered a substantial noise-generating land use. On-site noise sources are anticipated to be limited to heating, ventilation, and air conditioning (HVAC) equipment. Currently, the exact type, size, and the location of air handling equipment is unknown but, if included, this equipment is likely to be rooftop mounted and located behind a parapet wall or other open-top enclosure. If ground mounted, HVAC equipment would be shielded from site for aesthetic and security reasons. The proposed project would be located at least 840 feet from the nearest off-site residential building, and HVAC equipment would likely be shielded by rooftop parapets or other enclosures. As such, the project does not have the potential to generate substantial noise HVAC levels at sensitive receptor locations. For off-site traffic noise, it is estimated that the project would add no more than 70 daily vehicle trips to the local roadway network. Conservatively assuming 10 percent of these trips occur during the peak traffic hour, seven peak hour trips to and from the project site would be generated as a worst-case analysis. Given the elevated noise levels monitored at receptors surrounding the project site (71 dBA DNL), which occur due to the presence of SR-1, the modest increase in peak hour traffic would not meaningfully increase noise levels on roadways accessing the site. Traffic noise modeling conducted using the FHWA's Traffic Noise Model for the 2024 *Student Housing Project Addendum to the Cabrillo College Master Plan Environmental Impact Report* indicated the project would, at worst-case, increase noise

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	**Are formal compliance steps or mitigation required?**	**Compliance determinations**
		levels on local roads used to access the college campus by 0.2 dBA. Source Document(s): 1, 11, 12, 13, 14, 15, and 36
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes ☐ No ☒	The project site is not located within a federally designated Sole Source Aquifer (SSA) area. The nearest SSA is the Santa Margarita Sole Source Aquifer, designated by the U.S. Environmental Protection Agency on January 14, 1985. This aquifer underlies the Scotts Valley area in northern Santa Cruz County and serves as a primary drinking water source for that region. The Cabrillo College campus in Aptos is located approximately 10 miles south of Scotts Valley and lies outside the boundary of the Santa Margarita SSA. Therefore, the project is not subject to review under the Sole Source Aquifer provisions of the Safe Drinking Water Act or 40 CFR Part 149. Source Document(s): 16
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	The project site is not located within or near any designated wetland areas. The nearest significant water body, Soquel Creek, is located approximately 0.6 miles west of the project site and is separated by urban development, roadways (including SR-1), and other infrastructure. No wetlands or riparian habitat occur within the project footprint, and the project would not directly or indirectly affect any wetland resources. Therefore, the project would not conflict with Executive Order 11990. Source Document(s): 17
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes ☐ No ☒	The project site is not located on, adjacent to, or near any designated Wild and Scenic Rivers. The nearest designated Wild and Scenic River is the Big Sur River, which is located over 60 miles to the south in Monterey County. The project would therefore not affect a wild and scenic river. Implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act. Source Document(s): 18

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

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.
(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning/ Scale and Urban Design	2	The project site is located on the Cabrillo College campus in Aptos, which is designated Public Facility/Institutional (P) under the Santa Cruz County 2024 General Plan and zoned Public and Community Facilities (PF) under the County's Zoning Code. These designations were previously evaluated in the College's 1999 Master Plan EIR, which analyzed the applicability of and consistency with the County's land use framework. Because the General Plan and zoning designations for the campus have not changed since that time, the prior analysis remains applicable to development at the campus. No new or substantially more severe land use impacts would occur beyond those evaluated in the 1999 Master Plan EIR. The proposed development would be constructed on an existing athletic field and would not result in the vacation or obstruction of public streets or pedestrian accessways. The four-story facility would have a maximum building height of approximately 50 feet, and while not subject to County height restrictions, the building has been designed to be consistent with other large institutional structures on campus. The project would also include landscaping and pedestrian circulation features that reflect the surrounding campus character and broader goals for creating functional and accessible spaces for students and staff. Because the proposed childcare center and student housing are institutional in nature and located within an existing public college campus, the project would be consistent with the

Environmental Assessment Factor	Impact Code	Impact Evaluation
		intended land use of the site and compatible with surrounding development. As a result, the project would not conflict with applicable land use plans or the overall pattern of development in the area.
Soil Suitability/ Slope/Erosion/ Drainage/Storm Water Runoff	2	The project site consists of a flat athletic field with compacted turf and native soils classified as the Cabrillo soil series. A geotechnical investigation confirmed the site's suitability for development, and no evidence of landslides, unstable slopes, or expansive soils requiring specialized treatment was observed. Construction would involve minor grading and soil disturbance, which could increase the risk of erosion, particularly during wet weather. As discussed above, the project would be required to obtain coverage under the State Water Resources Control Board Construction General Permit, which requires development and implementation of a SWPPP that includes BMPs such as perimeter controls, slope stabilization, and material handling protocols to minimize erosion and sedimentation. Post-construction, the project would comply with Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032, which regulates long-term stormwater runoff and infiltration. The project will incorporate Low Impact Development features to retain, treat, and infiltrate stormwater onsite. These measures would preserve groundwater recharge potential and reduce pollutant loading to downstream water bodies, including Borregas Creek and Tannery Gulch. The project site is located in FEMA Flood Zone X, indicating minimal flood risk. It is not located near any enclosed waterbodies, mapped tsunami hazard zones, or other hydrologic features that would pose a risk to the site or future occupants. Source Document(s): 3, 19, 20, 22, 23, and 24
Hazards and Nuisances including Site Safety and Noise	2	*Site Safety* Development of the project site with residential uses would not create a risk of natural hazards, explosions, release of hazardous substances, or other dangers to public health. The project site is in an urban setting and development on the site would be compatible with surrounding institutional, residential, and commercial uses. A Phase I Environmental Site Assessment and a supplemental subsurface investigation were conducted in 2024 and 2025, respectively, and did not identify any recognized environmental conditions. Soil and soil vapor sampling did not detect contaminants at levels of concern. Arsenic concentrations in soil were consistent with typical background levels in California, and petroleum-related compounds detected in vapor samples were below screening thresholds for new residential

Environmental Assessment Factor	Impact Code	Impact Evaluation
		development. No evidence of contamination or hazardous sources exists on-site. On-site construction would be required to comply with the requirements of the latest California Building Code, which includes compliance with earthquake standards and fire codes and regulations. Therefore, the proposed action would not have a substantive adverse effect on site safety. *Construction Noise* Construction noise would be temporary and consistent with levels analyzed in the 1999 Cabrillo College Master Plan EIR and its Addendum, which used the FTA General Assessment methodology to evaluate construction noise impacts. The project would implement standard EIR-based noise control measures, such as equipment mufflers, restricted work hours, and shielding for stationary sources, to reduce potential impacts. While the County Noise Ordinance sets general limits, the project's approach relies primarily on the previously adopted noise mitigation framework established in the EIR. *Community Noise* As discussed above under "Noise Abatement and Control," the proposed project would place new residences at the project site. DNL exterior noise from SR-1 was calculated to be 71 to 72 dBA DNL at the project site, which would fall within HUD's "normally unacceptable" designation. The project would be required to comply with the requirements of Title 24 of the California Code of Regulations (the California Building Code) to ensure that interior noise levels in project residential units would meet the interior noise goal of HUD and the State of California. Source Document(s): 15 and Attachments 1 and 2

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The project site is currently an athletic field located on the Cabrillo College Aptos campus and does not support any existing employment-generating uses. Development of the site would result in temporary construction employment over an estimated 22-month construction period, supporting local construction-related jobs and related industries. The completed project would introduce up to 246 student housing units (up to 686 beds) and an approximately 5,800-square-foot childcare center. While the student housing component would not directly support long-term employment beyond residential management and maintenance staff, the on-

Environmental Assessment Factor	Impact Code	Impact Evaluation
		site childcare center would generate permanent jobs for educators, childcare aides, and administrative personnel. These positions would support local income levels and provide campus-serving employment consistent with the college's educational mission. The project does not include commercial retail space and is not expected to generate broader economic activity beyond campus-related uses.
Demographic Character Changes, Displacement	2	*Demographic Character Changes and Displacement* The 2020 U.S. Census reported that the Aptos Census Designated Place had a population of approximately 6,664. As of mid-2024, estimates indicate modest decline to approximately 6,477 residents. The average household size in Santa Cruz County is approximately 2.66 persons per household. The proposed project would include 246 student housing units, with up to 686 beds, plus an approximately 5,800 sq ft childcare facility. Assuming full occupancy in occupied units and adopting the county household average, the housing component could serve approximately 655 additional residents (246 units × 2.66 persons/unit). This would represent an incremental increase in Aptos's population of about 9.8 percent (655 ÷ 6,664). Though this represents a notable increase, the residents are enrolled Cabrillo College or UC Santa Cruz students, individuals already part of the regional community. The project would not affect the racial, ethnic, or economic makeup of the broader population. Current demographic estimates for Aptos indicate approximately 76% White, 17% Hispanic or Latino, and 3 to 4% Asian. The project makes no physical changes to the surrounding neighborhoods and would not introduce demographic displacement pressures. *Displacement* The project site is currently used as an athletic field and portable buildings that house Delta High School and a sheriff's substation are located on the east side of the Parking Lot S to the north of the site. These uses would be relocated elsewhere on the Cabrillo College campus as part of the project. Delta High School would be relocated to Building 500, and the sheriff's substation would be moved to another available on-campus location, potentially the former Delta High School portable. As such, the project would not result in the displacement of residential, commercial, or community-serving land uses, and no relocation assistance would be required. The project is consistent with long-term campus development plans and would not prompt indirect displacement in adjacent areas. Source Document(s): 25 and 26

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The Cabrillo College campus is located within the Pajaro Valley Unified School District (PVUSD), which operates a range of elementary, middle, high, and charter schools. Nearby public schools that would serve K–12 students within PVUSD include Mar Vista Elementary (0.4 miles), Aptos Junior High (2.4 miles), and Soquel High School (1.8 miles). The proposed project would primarily serve Cabrillo College and UCSC students and is not anticipated to generate enrollment impacts on K–12 public schools in the surrounding area. Therefore, the proposed project would not result in adverse effects on local educational services or facilities. The project site does not contain any cultural facilities, and the proposed action would not displace or adversely affect any existing cultural resources. Several cultural facilities are located nearby including the Cabrillo College Visual and Performing Arts Complex, the Rio Theatre (1.2 miles southeast), and the Capitola Historical Museum (2.5 miles southwest). No physical changes or access barriers to nearby cultural venues would occur, and the project would not generate substantial demand that could impact ongoing operations. Therefore, no adverse impacts on cultural facilities would occur as a result of the project.
Commercial Facilities	2	Cabrillo College campus is located in an area with convenient access to retail and service establishments. The project site is approximately 0.3 miles from a commercial corridor along Soquel Drive, which includes businesses accessible by foot, bicycle, or transit. These amenities would support the daily needs of future student residents and childcare center users. No commercial or retail development is proposed as part of the project, and no changes to commercial zoning or land use are planned. The project would not displace existing commercial uses, introduce new commercial activity on-site, or generate significant new demand for commercial services beyond what is already available. Because the surrounding area already provides adequate access to commercial amenities, and the project would not substantially alter the local supply or demand for such services, no adverse impact on commercial facilities would occur.
Health Care and Social Services	2	The proposed project would not directly impact any health care or social service facilities. Cabrillo College offers basic on-campus health and mental health services for students. Additional facilities, including Dominican Hospital, Watsonville Community Hospital, Sutter Maternity & Surgery

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Center (all within approximately 6 miles), and Doctors on Duty Urgent Care (approximately 1 mile away) are accessible by transit or vehicle and provide a full range of medical services. Local social services are available through County agencies and nonprofits. Because the project would primarily house college students, it is not expected to significantly increase demand for health care or social services. However, because some units would be reserved for student families, the project could result in a modest increase in demand for these services, though this increase would be limited by the scale of the project and the availability of services in the area.
Solid Waste Disposal / Recycling	2	Solid waste generated by the proposed project would be managed by Santa Cruz County Recycling and Solid Waste Services and initially sent to the Buena Vista Landfill. Although the landfill is expected to reach capacity by 2030, future waste would be redirected to the Monterey Peninsula Landfill, which has sufficient remaining capacity to operate for approximately 90 more years. The project would generate an estimated 55 tons of solid waste annually, with only about 13.7 tons requiring landfill disposal after accounting for the required 75 percent waste diversion rate under California Assembly Bill 341. These waste quantities fall well within the permitted and available capacities of both landfills. Solid waste services are already established at the Cabrillo College campus and would adequately accommodate the project's needs. Therefore, there is no potential for the waste generated by the proposed project to exceed existing disposal capacity or require the development of new disposal facilities. Source Document(s): 27
Waste Water / Sanitary Sewers	2	The proposed project would generate approximately 0.02 million gallons per day (mgd) of wastewater. Wastewater would be conveyed via a new connection to an existing sewer main in Cabrillo Drive and treated at the City of Santa Cruz Wastewater Treatment Plant (WWTP), which has sufficient remaining capacity. The project’s wastewater generation is well below the 0.126 mgd campus-wide projection in the 1999 Master Plan and falls within the Santa Cruz County Sanitation District’s (SCCSD) current allocation, which remains under its permitted 8 mgd contribution to the WWTP. The new sewer connection would cross a sensitive riparian corridor, but mitigation measures have been developed to reduce potential construction impacts. Existing SCCSD conveyance infrastructure was previously found adequate to support full campus buildout, and current wastewater flows

Environmental Assessment Factor	Impact Code	Impact Evaluation
		remain below those levels. No upgrades to regional infrastructure or treatment facilities would be required, and the project would not interfere with ongoing wastewater operations or maintenance. Source Document(s): 28
Water Supply	2	The proposed project would be served by the Soquel Creek Water District (SqCWD), which relies entirely on the Santa Cruz Mid-County Groundwater Basin. To support long-term sustainability, the SqCWD has implemented a groundwater sustainability plan (GSP) and is launching the Pure Water Soquel project in 2025 to add 1,500 acre-feet per year (AFY) of basin recharge. The project is estimated to increase net water demand by approximately 9 to 26 AFY, accounting for the site's existing irrigation use. Even under conservative projections, total SqCWD demand with the project would remain close to or slightly above its preferred pumping goal of 3,800 AFY, but well below long-term sustainable limits. The District's Water Shortage Contingency Plan (WSCP) includes conservation measures that would apply to the project during drought or shortage conditions. Overall, existing water supplies and planned recharge projects are expected to adequately meet the project's needs without adversely affecting the groundwater basin. Source Document(s): 29
Public Safety - Police, Fire and Emergency Medical	2	*Police Protection* Law enforcement services for the Cabrillo College campus are provided by the Santa Cruz County Sheriff's Department. A Sheriff's substation operates on campus in a temporary facility located in Lot S, just north of the project site. One deputy is assigned full-time and is present during regular business hours. Based on prior analysis under the 1999 Master Plan EIR, development of the campus would not substantially alter police patrol areas or response times. The College also maintains safety infrastructure, including security phones, lighting, and signage, which support continued effective law enforcement coverage. *Fire Protection* Fire protection services are provided by the Central Fire District of Santa Cruz County (CFD), which operates seven stations. The nearest, Station No. 5, is located less than 0.25 miles east of campus along Soquel Drive. In 2024, Station No. 5 responded to 1,492 total incidents and reported average response times of 6 minutes, 17 seconds for emergency medical calls and 6 minutes, 41 seconds for fire calls. The College would continue to comply with applicable fire code requirements, including installation of automatic sprinklers in

Environmental Assessment Factor	Impact Code	Impact Evaluation
		new buildings and implementation of infrastructure plans that meet fire flow and access standards. *Emergency Medical Services* Emergency medical services are coordinated through the Central Fire District and countywide EMS providers. The proximity of Station No. 5 ensures rapid EMS response, and the project would maintain required emergency access routes in compliance with Public Resources Code §§ 4290 and 4291. The project would not result in increased demand that would exceed current EMS service capacity. Source Document(s): 30, 31, and 32
Parks, Open Space and Recreation	2	*Onsite Facilities* The multi-purpose field on the project site is currently used by campus users on weekdays during school hours and by outside groups during weekday late afternoons/evenings and on weekends. Following implementation of the proposed project, this recreational facility would no longer be available for use. Campus users who currently utilize the field could be accommodated at other on-campus recreational facilities, including the track/soccer field and stadium. Non-campus users would no longer have access to this campus field and would need to seek use of other recreational facilities in the surrounding community. The project site is designated Public and Community Facilities (PF), not Parks, Recreation and Open Space (PR), and is not part of the County parks system. Accordingly, the project would not result in the loss of a designated County park facility. Although outside groups that currently use the field would need to identify alternative locations, this change would affect access to a campus recreational field rather than remove public parkland from the County system. The County Parks Department manages 43 neighborhood, community, regional, and rural parks totaling approximately 890 acres, serving a population of 133,493 in unincorporated areas—equivalent to roughly 6.6 acres of usable recreational parkland per 1,000 residents. These existing parklands are adequate to meet current demand, and County policies provide for expansion of park facilities to meet future recreational needs. *Offsite Facilities* The following parks and recreational areas are within close vicinity of the project site: • **Aptos Village Park** is a community park featuring picnic areas and open lawn, located approximately 1.4 miles northeast of campus;

Environmental Assessment Factor	Impact Code	Impact Evaluation
		• **Seacliff State Beach** is a beachfront park with a historic pier, located about 1.4 miles southwest of campus; • **New Brighton State Beach** is a coastal park with sandy beach and bluff-top picnic areas, located roughly 0.6 miles south; • **Rio Del Mar State Beach** is a sandy beach and dunes recreation area, located about 1.8 miles south-southeast of the campus; and • **Forest of Nisene Marks State Park** is a large redwood park offering 40+ miles of trails, located approximately 2 miles northwest of campus with trail connections via the Cabrillo College trail network. The proposed project is not expected to directly impact any of these open space resources or significantly increase usage of nearby parks beyond current or anticipated capacities. Given the availability of nearby parks and recreational facilities, Cabrillo College campus would continue to have adequate access to parks, open space, and recreational amenities. Source Document(s): 37
Transportation and Accessibility	2	*Traffic* The project site would be accessed from Cabrillo College Drive via Parking Lot S, and no off-site roadway modifications are proposed. Project-related utility connections within the Cabrillo College Drive right-of-way may temporarily affect traffic circulation during construction. However, a construction transportation control plan would be implemented to maintain safe and efficient traffic flow during work activities. The project would not result in permanent changes to the roadway network or circulation patterns. Traffic generated by the project would be substantially less than what was assumed under the 1999 Master Plan, and intersection and roadway operations would remain acceptable. *Transit* The project site is served by the Santa Cruz Metropolitan Transit District. Routes 1, 2, 55, and 73 currently serve the Cabrillo College campus, with stops located along Soquel Drive east of Cabrillo College Drive. No new transit facilities are required. On-campus housing would reduce reliance on automobile travel and improve access to existing transit service. *Emergency Access and Evacuation Routes* As required by the College's 2018 Emergency Operations Plan, a building evacuation plan would be prepared for the proposed project. Emergency vehicle access would be maintained through the existing circulation network and

Environmental Assessment Factor	Impact Code	Impact Evaluation
		designed in accordance with County safety standards. Construction would not interfere with long-term emergency access. Therefore, the project would not impair emergency response or evacuation plans. *Pedestrian* Pedestrian access would be supported by existing and proposed campus pathways. The project site is located on the relatively flat portion of campus south of Soquel Drive. New walkways would connect the site to the broader campus circulation system. No changes to existing pedestrian circulation patterns are proposed. *Bicycle Circulation* Bicycle access is available via existing lanes on Soquel Drive, Park Avenue, and State Park Drive. The project would not interfere with these facilities and is expected to promote active transportation modes. Source Document(s): 33 and 34

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	No known unique natural or water features are present on the project site. Implementation of the proposed project would not affect water resources, nor would it increase demand for groundwater resources. As noted above, water service would be provided by the SqCWD. Wastewater at the project site would be collected by the Santa Cruz County sanitary sewer system and ultimately treated at the Santa Cruz WWTP. The proposed project would not discharge effluent into surface water or groundwater. The nearest watercourse, Borregas Creek, is located approximately 600 feet (0.11 miles) east of the project site. Although Borregas Creek is located approximately 600 feet east of the project site, implementation of source and treatment control BMPs, as required by the Construction General Permit, would ensure that stormwater leaving the site is properly filtered and detained. Therefore, no adverse impacts to nearby surface waters, including Borregas Creek, are expected. Source Document(s): 24
Vegetation, Wildlife	3	The project site is located on an existing athletic field within the Cabrillo College campus and is surrounded by coast live oak woodland, non-native grassland, and eucalyptus. A 2024 arborist report documented 90 trees across eight species, with 14 trees potentially qualifying as protected under County

Environmental Assessment Factor	Impact Code	Impact Evaluation
		guidelines. Most trees are in fair or poor condition, with only one rated as suitable for preservation. Vegetation communities include 1.1 acres of non-native grassland, 0.5-acre of eucalyptus woodland, and 1.7 acres of coast live oak woodland, as well as small areas of oak riparian and degraded willow riparian vegetation. No suitable habitat for special-status plant species has been identified within the project footprint, and vegetation loss would be consistent with prior analyses under the campus Master Plan EIR. Wildlife habitat is limited and supports mostly urban-adapted species and nesting birds. Pre-construction surveys and buffer zones would be implemented to avoid impacts to nesting birds per the Migratory Bird Treaty Act. The site is within a State Responsibility Area and designated as a Moderate Fire Hazard Severity Zone per CAL FIRE, but it lacks steep slopes or nearby wildland-urban interface. The project would comply with current California Fire Code standards, including fire suppression systems and defensible space. Tree protection measures, vegetation buffers, and best management practices would be used during construction to reduce impacts. No significant effects on vegetation or wildlife are anticipated. Source Document(s): 35, 36, and Attachment 3
Other Factors	2	Although the project is located outside of the Bay Area Air Quality Management District's (BAAQMD's) jurisdiction, BAAQMD's updated CEQA Thresholds for Evaluating Significance of Climate Impacts (adopted in April 2022) are widely referenced and provide a technically supported, conservative benchmark for assessing consistency with statewide climate goals. These BAAQMD thresholds identify what will be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. To avoid the finding of a significant impact related to climate change, a land use project must include the following design elements: **Buildings** • The project will not include natural gas appliances or natural gas plumbing. • The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines. **Transportation** The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent), or will meet a

Environmental Assessment Factor	Impact Code	Impact Evaluation
		locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: • Residential projects: 15 percent below existing VMT per capita. • Office projects: 15 percent below the existing VMT per employee. • Retail projects: No net increase in existing VMT. • The project will achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2 The proposed project would be consistent with the California Energy Code (Title 24, Part 6) and long-term decarbonization goals. It would meet current state and local energy efficiency standards, including CALGreen requirements for multifamily housing and dormitory uses under Part 11 of the California Building Standards Code, and would not result in substantial energy waste or unnecessary consumption of non-renewable resources. The project would also comply with the Cabrillo College Sustainability Plan and be constructed in accordance with National Green Building Standards. Electricity would be supplied by PG&E, which is subject to state mandates requiring 60 percent renewable energy by 2030 and 100 percent by 2045. Transportation-related emissions would be minimal, as the proposed project is expected to serve students, staff, and faculty already commuting to campus, thereby reducing overall trip lengths. A 2024 transportation analysis by Kimley-Horn found that the project would reduce student commute-related VMT by 16 to 28 percent under both existing and cumulative conditions. Total operational GHG emissions are estimated at 14 metric tons of CO_2e per year. Therefore, the proposed project would not substantially impact climate change by way of generated greenhouse gas emissions. Source Document(s): 34

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	2	The proposed project would be constructed in compliance with current state and local energy efficiency standards, including the CALGreen and Title 24. No natural gas infrastructure would be included, reducing reliance on fossil fuels. Electricity would be supplied by PG&E, which is subject to California's Renewable Portfolio Standard and Senate Bill 100, requiring 60 percent renewable energy by 2030 and 100 percent by 2045. The project would also be consistent with the 2016 Cabrillo College Sustainability Plan, which includes specific goals related to reducing fossil fuel use and increasing energy efficiency. Applicable goals include: • Reducing energy usage by 2 percent annually from a 2009 baseline. • Constructing new buildings in accordance with U.S. Green Building Council standards. • Achieving carbon neutrality on campus by 2060. Because the project would be all-electric, comply with modern energy codes, and utilize utility-supplied renewable energy, it would not result in excessive energy consumption or inefficient use of energy resources. The proposed project would not result in a significant adverse energy impact. Source Document(s): 37

Additional Studies Performed:

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

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List of Permits Obtained:
Building permits issued by the District State Architect are anticipated to be obtained by June 30th, 2026.

Public Outreach [24 CFR 50.23 & 58.43]**:**
The Cabrillo Community College District Board of Trustees held a public approval hearing for the project on November 4, 2024. In addition, the College hosted a public open house on January 29, 2025, to share the proposed project design and engage interested community members.

Cumulative Impact Analysis [24 CFR 58.32]**:**
The proposed project is a stand-alone action on the project site and is not part of a series of activities. Furthermore, the environmental and social impacts of potential future development on-site have been evaluated as part of the project. Therefore, the project would not result in additional cumulative impacts from future related actions.

Alternatives [24 CFR 58.40(e)]
In developing the Cabrillo College Student Housing Project, alternatives were considered to determine the most feasible way to provide affordable, on-campus student housing while minimizing environmental impacts. One alternative explored was construction of housing at an off-campus site elsewhere in the region. However, this alternative was determined to be infeasible due to limited land availability, increased infrastructure and transportation demands, and reduced access to campus services and facilities.

The selected on-campus location offers proximity to existing academic and support buildings, efficient use of available infrastructure, and enhanced student access to public transportation and campus resources. No other alternatives were identified that would meet the project's objectives more effectively or with fewer environmental impacts.

No Action Alternative [24 CFR 58.40(e)]:
Under the No Action Alternative, the proposed development of student housing and associated facilities on the Cabrillo College campus would not occur. The project site would remain an athletic field and underutilized open space, and no additional on-campus housing would be provided for Cabrillo College or UC Santa Cruz students. This alternative would not support the College's goals of expanding on-campus housing opportunities to address student housing insecurity, nor would it alleviate demand for housing in the broader Aptos and Santa Cruz County area. As such, the No Action Alternative would not contribute to regional housing needs, reduce commuting distances, or support the efficient use of existing campus infrastructure.

Summary of Findings and Conclusions:
With adherence to applicable laws, authorities, and other enforceable measures, all potentially adverse effects of the proposed project would be reduced to levels below established significance thresholds or avoided completely. The project would not have any potentially significant impacts to the extent that an Environmental Impact Statement would be required.

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

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

Law, Authority, or Factor	Mitigation Measure
Endangered Species Act (16 U.S.C. § 1531 et seq.) – Voluntary Conservation Measures for Monarch Butterfly (Federal Candidate Species)	*Worker Environmental Awareness Training* Cabrillo College or its contractor shall retain an approved biologist who shall present environmental awareness training to construction personnel. The training shall include a description of special-status species, their habitats, associated legal protections, and required protective measures to

Law, Authority, or Factor	Mitigation Measure
	facilitate awareness among construction personnel. The training will also provide construction personnel with contact information of a qualified biologist should suspected special-status species be observed during their work activities. <u>*Monarch Butterfly Avoidance*</u> Measures to avoid impacts to overwintering and breeding monarch butterflies are as follows: • Construction activities in and around potential butterfly overwintering sites shall occur outside of the overwintering season (September 16 to March 14), to the greatest extent feasible, to avoid potential impacts on overwintering monarch butterflies. However, when it is not feasible to avoid the overwintering season and construction activities take place during this time, the following measures shall apply: - Preconstruction surveys shall be conducted for overwintering monarch butterfly sites within 100 feet of the construction areas. - Surveys for overwintering aggregations of monarch butterflies shall be conducted over the winter season (November to first week of March) prior to construction activities. A minimum of two surveys shall be conducted: one in late November and the other during the week of January 1. Surveys shall follow survey methods specified by the Xerces Society for Invertebrate Conservation (Xerces 2004). - If an active overwintering site is located, work activities shall be delayed within 100 feet of the site location until avoidance measures have been implemented. Appropriate avoidance measures shall include the following measures (which may be modified as a result of coordination with the CDFW to provide equally effective measures): - If the qualified biologist determines that construction activities would not affect an active overwintering site, activities may proceed without restriction. - A minimum 100-foot no-disturbance buffer shall be established around the overwintering site to avoid disturbance or destruction until after the overwintering period has ended. If site conditions warrant a smaller buffer, the extent of the no-disturbance buffer may be decreased by the qualified biologist in coordination with CDFW. - Throughout the year, the District shall avoid removing or trimming trees utilized by monarch butterflies or trees adjacent to the winter roost to

Law, Authority, or Factor	Mitigation Measure
	prevent indirect changes to the humidity, wind exposure, and temperature within the immediate vicinity of the roost site. Any routine tree trimming shall be done between April and August to eliminate the risk of disturbance to monarch colonies, and shall be conducted under the guidance of a qualified monarch butterfly specialist if butterflies have been documented in the project site. • Construction activities occurring from March 15 to September 15 must have a preconstruction survey conducted by an approved biologist for suitable monarch butterfly breeding habitat. If host plants are detected, an avoidance buffer of 5 feet will be implemented around the plant(s).
National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	*Unanticipated Discovery of Archaeological Resources* If pre-contact or historic-era cultural materials are encountered during Project implementation, all construction activities within 100 feet shall halt, and a Secretary of the Interior-qualified Archaeologist shall inspect the find within 24 hours of discovery and notify the College of their initial assessment. If the find is deemed pre-contact, affiliated Native American tribal representatives will be invited to evaluate the find. If the College determines, based on recommendations from a Secretary of the Interior-qualified archaeologist and affiliated Native American tribal representatives (if applicable), that the resource may qualify as a historic property, the resource shall be avoided, if feasible. If avoidance is not feasible, the College shall work with a Secretary of the Interior-qualified archaeologist and affiliated Native American tribal representatives (if applicable) to determine treatment measures to avoid, minimize, or mitigate any potential adverse effects to the resource. This shall include documentation of the resource and may include data recovery, if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource. *Unanticipated Discovery of Human Remains* In the event of discovery or recognition of any human remains during Project implementation, construction activities within 100 feet of the find shall cease until the County Coroner has been contacted to determine that no investigation of the cause of death is required. The Coroner shall contact the Native American Heritage Commission within 24 hours if the Coroner determines the remains to be Native American in origin. The Commission will then identify the person or persons it believes to be the most likely

Law, Authority, or Factor	Mitigation Measure
	descendant from the deceased Native American, who in turn would make recommendations to the College for the appropriate means of treating the human remains and any associated funerary objects.
Noise Abatement and Control (24 CFR Part 51, Subpart B)	*Interior Noise Levels* The Cabrillo Community College District shall prepare final design plans and incorporate building design and acoustical treatments to ensure compliance with state building codes and County noise standards. A project-specific acoustical analysis shall be prepared to ensure that the design incorporates controls to reduce interior noise levels to 45 dBA Ldn or lower within the residential units. The project applicant shall conform with any special building construction techniques requested by the Division of the State Architect, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking. *Construction Noise Control and Pile Driving Measures* To reduce temporary construction-related noise levels, all project construction activities shall implement noise control measures adopted as part of the 1999 Cabrillo College Master Plan. These include limiting construction to the hours of 8:00 a.m. to 6:00 p.m. on weekdays, 9:00 a.m. to 5:00 p.m. on Saturdays, and prohibiting construction on Sundays and State-observed holidays; notifying nearby sensitive receptors (e.g., Twin Lakes Church, adjacent residences) in advance of construction activities; using appropriate noise reduction strategies such as relocating stationary equipment away from sensitive uses, shutting off idling equipment, and installing temporary acoustic barriers around stationary noise sources when construction occurs near occupied facilities; and temporarily relocating classes to other campus locations if construction would occur for an extended duration near academic buildings. If pile driving equipment is required, temporary construction barriers shall be installed when pile driving occurs near sensitive uses, to provide at least 5 dBA of noise attenuation.

Determination:

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

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

Preparer Signature: _____ Date:_____

Name/Title/Organization: _____

Certifying Officer Signature: _____ Date:_____

Name/Title: _____

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