

## MEMORANDUM

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**To:** Porcila Wilson, County of Santa Cruz  
**From:** Catherine Wade, PhD  
**Subject:** National Environmental Policy Act Re-Evaluation of 2021 Chanticleer Avenue Affordable Housing Project  
**Date:** May 21, 2026  
**Attachments:**

|                                    |  |
|------------------------------------|--|
| 1. Figure 1, Project Site          | 7. Archaeological Resources Report                   |
| 2. Site Plan                       | 8. Built Environment Inventory and Evaluation Report |
| 3. Phase I ESA                     | 9. SHPO Consultation Letter                          |
| 4. Species List                    | 10. Noise Report                                     |
| 5. Explosive and Flammable Hazards | 11. NWI Wetlands                                     |
| 6. FEMA Flood Hazard Zones         |  |

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## Purpose of Memorandum

This memorandum documents a National Environmental Policy Act (NEPA) re-evaluation for the 2021 Chanticleer Avenue Affordable Housing Project pursuant to U.S. Department of Housing and Urban Development (HUD) regulations at 24 CFR Part 58. An Environmental Assessment (EA) for the original project was completed, and a Finding of No Significant Impact (FONSI) was issued in June 2025. The project received Authority to Use Grant Funds (AUGF) in July 2025. Since that time, the proposed project has been revised to include an adjacent parcel located at 2030 17th Avenue, along with associated changes to the project description. A re-evaluation of the environmental review is now required because the current development proposal differs from the project analyzed in the June 2025 EA in terms of project site size, unit count, site design, circulation, and amenity configuration. These changes constitute a modification in project scope under 24 CFR §58.47(b), necessitating confirmation that the original environmental findings, mitigation measures, and FONSI remain valid. Attachment 1 shows the revised project site and Attachment 2 presents the revised site plan.

HUD's Regulations at 24 CFR §58.47 require a re-evaluation of environmental findings to determine if the original findings are still valid when:

- (1) The recipient proposes substantial changes in the nature, magnitude or extent of the project, including adding new activities not anticipated in the original scope of the project;
- (2) There are new circumstances and environmental conditions which may affect the project or have a bearing on its impact, such as concealed or unexpected conditions discovered during the implementation of the project or activity which is proposed to be continued; or
- (3) The recipient proposes the selection of an alternative not in the original finding.

If the original findings are still valid then the re-evaluation can be added to the Environmental Review Record (ERR). If the re-evaluation indicates potentially significant impacts, then the Responsible Entity must prepare an EA or Environmental Impact Statement (EIS).

## Background

The June 2025 EA evaluated the proposed construction of a 30- to 54-unit affordable multifamily housing development at 2021 Chanticleer Avenue, including all associated site improvements. At that time, the project site consisted solely of Assessor's Parcel Number (APN) 029-071-03, and no additional parcels or off-site areas were anticipated or evaluated for project use.

Since completion of the EA, the project applicant has refined the development program and identified the adjacent parcel at 2030 17th Avenue (APN 029-071-13) as an additional project component needed to support the revised site design and circulation plan. This parcel, located directly east of the original project site, is an existing developed property and would now be incorporated into the overall project footprint for access, parking, and related improvements.

The revised project increases the overall site area and proposes a 61-unit development. The revised design eliminates the previously evaluated semi-subterranean garage option in favor of surface parking with dual access from Chanticleer Avenue and 17th Street, adjusts amenity placement, and updates architectural design. These revisions change the project's site footprint, scale, circulation, and configuration, triggering the need for a re-evaluation under 24 CFR § 58.47(b) to confirm that environmental conclusions reached in the June 2025 EA remain valid.

## Revised Project Description

The revised project would also involve the demolition of one single-family home and construction and operation of a 61-unit, 100% affordable multifamily housing development, located at 2021 Chanticleer Avenue and 2030 17th Avenue in unincorporated Santa Cruz County. The project would consist of a 3-story residential building of approximately 58,000 square feet, containing 12 studio, 18 one-bedroom, 15 two-bedroom, and 15 three-bedroom units, plus 1 two-bedroom manager's unit.

The revised site plan incorporates both parcels, expanding the overall project footprint and updating circulation and access. Parking would be provided in surface lots with approximately 64 stalls, including ADA accessible spaces. Vehicular access would be available from both Chanticleer Avenue and 17th Avenue.

The building would be oriented along the southern property line adjacent to Chanticleer County Park. Resident amenities would include a community room, bike storage, laundry facilities, and on-site offices for resident services staff. The project would also utilize the adjacent County park for outdoor recreation needs.

Architecturally, the building would be designed in a three-story craftsman style with setbacks from surrounding residential areas. All utilities and infrastructure—water, sewer, stormwater, and electrical—would connect to existing public systems. Construction would include standard site preparation, grading, utility installation, and building construction.

A summary of key changes is provided in Table 1.

**Table 1. Comparison of Original Project vs. Revised Project**

| Project Element                 | Original EA (June 2025)                                    | Revised Project (2026)  |
|---------------------------------|--|---|
| Project Site / Footprint        | Single parcel at 2021 Chanticleer Avenue; 1.01 acres       | Expanded project site includes two parcels and adjacent street rights-of-way: 2021 Chanticleer Avenue (1.01 acres), 2030 17th Avenue (0.24 acres) and adjacent street rights-of-way (0.17 acres), for a total footprint of 1.42 acres |
| Unit Count                      | 30–54 units  | 61 units (net increase of 6 units minus existing residence)   |
| Building Height / Configuration | 3–4-story building; central site placement                 | 3-story building located along southern property line   |
| Parking                         | Semisubterranean garage or at grade parking (46–70 spaces) | Surface parking only; ~64 stalls  |
| Site Access                     | Access from Chanticleer Avenue                             | Two access points: Chanticleer Avenue and 17th Avenue   |
| Recreation / Open Space         | On-site 600-square-foot play area assumed                  | Use of adjacent County park for recreation; no on-site playground   |
| Amenity Configuration           | Community room, laundry, potential fitness/business spaces | Community room, bike storage, laundry, on-site service offices  |
| Architectural Style             | Contemporary / Sea Ranch influenced                        | Craftsman style exterior design   |

## Environmental Considerations

Each compliance factor under 24 CFR §§ 58.5 and 58.6 was reviewed and the table below indicates whether the project revision requires additional review. EA factors were also reviewed. Table 2 summarizes the re-evaluation of the environmental review.

**Table 2. Re-Evaluation Summary**

| Topic  | Summary of Changes to ERR   |
|--|---|
| <b>Statutes, Executive Orders, and Regulations Listed at 24 CFR 58.6</b> |   |
| Airport Hazards  | <b>No change.</b> The additional parcel is adjacent to the project site and similar distance to airports.   |
| Coastal Barrier Resources  | <b>No change.</b> No coastal barrier resources in California.   |
| Flood Insurance  | <b>No change.</b> The additional parcel, like the project site, is in Flood Zone X and flood insurance is not required.   |
| <b>Statutes, Executive Orders, and Regulations Listed at 24 CFR 58.5</b> |   |
| Clean Air  | <b>No change.</b> Temporary increases in emissions from equipment and vehicles would be similar to those analyzed for the original project and remain below thresholds with mitigation (AIR-1). |
| Coastal Zone Management  | <b>No change.</b> Like the original project site, the additional parcel is not within the coastal zone.   |

**Table 2. Re-Evaluation Summary**

| Topic                              | Summary of Changes to ERR   |
|------------------------------------|---|
| Contamination and Toxic Substances | <b>Phase I ESA and analysis updated.</b> No RECs identified; addition of parcel does not introduce new contamination concerns. See Attachment 3.  |
| Endangered Species                 | <b>Species list updated.</b> A new official species list was obtained from the U.S. Fish and Wildlife Service to support updated Endangered Species Act compliance for the project. The expanded project site supports a similar assemblage of special-status species with potential to occur (see Attachment 4). Compared to the original Information for Planning and Consultation (IPaC) list, one additional plant species—Monterey spineflower ( <i>Chorizanthe pungens</i> var. <i>pungens</i> )—has been identified as having the potential to occur on site. All other species remain unchanged. No designated critical habitat overlaps the project site. The new project parcel is developed, located in a developed urban area, and does not support critical habitat. There are no changes to the critical habitat map. The previous determination that the project would have no effect on endangered species remains valid.   |
| Explosive and Flammable Hazards    | <b>Database search updated.</b> An updated search of the California Environmental Protection Agency (CalEPA) Regulated Site Portal was conducted using a 1-mile buffer around the expanded project site boundary (see Attachment 5). With the exception of two facilities, all chemical storage sites located within 1 mile of the project site are outside of HUD’s acceptable separation distance (ASD). Of the two facilities—the County of Santa Cruz Sheriff’s Office and the Capitola Gas Station—the gas station was identified in the original analysis as being within HUD’s minimum separation distance. Therefore, the only new facility that falls within 1 mile of the expanded project site boundary is the County of Santa Cruz Sheriff’s Office. Line of sight between both the Sheriff’s office and gas station and the project site is obstructed by intervening housing, commercial buildings, and Rodeo Gulch. As such, the intervening buildings and natural landscape provide adequate separation as defined in 24 CFR 51.205(c) and as outlined in the ASD Guidebook since there is no clear line of sight from the project site to the ASTs. The updated project remains in compliance with explosive and flammable hazard regulations and no mitigation is required. |
| Farmlands Protection               | <b>No change.</b> The additional parcel is adjacent to the project site and is also classified as Urban and Built-Up Land.  |
| Floodplain Management              | <b>Flood Hazard Zones map updated.</b> The map of flood hazard zones identified by the Federal Emergency Management Agency (FEMA) has been updated to include the additional parcel (see Attachment 6). Like the original project site, the additional parcel is located in Zone X, an area of minimal flood hazard.  |
| Historic Preservation              | <b>Analysis and Section 106 consultation updated.</b> For the expanded Area of Potential Effects (APE), additional cultural resources investigations were completed to ensure compliance with Section 106 requirements (see Attachments 7 and 8). These efforts included an updated records search at the Northwest Information Center of the California Historical Resources Information System for the amended APE, encompassing the newly added parcel at 2030 17th Avenue and adjacent street rights-of-way, as well as review of prior studies, historic registers, maps, and local inventories. An intensive-level pedestrian survey was conducted across the entire expanded APE, including systematic transects and opportunistic soil observations, along with limited subsurface testing via an auger boring to assess the potential for buried cultural deposits. Built environment resources within the expanded APE that were 45 years or older were documented and evaluated for eligibility. Archival and property-specific research was also undertaken using county and local repositories.  |

**Table 2. Re-Evaluation Summary**

| Topic  | Summary of Changes to ERR   |
|--|---|
|  | <p>The County initially completed Section 106 consultation for the project and received no objection from the State Historic Preservation Officer (SHPO) on May 14, 2025. Although no tribal responses were received within the initial 30day notification period, the County received a consultation request from the Costanoan Rumsen Carmel Tribe in May 2025 and subsequently consulted with the tribe. As a result of this consultation, the applicant agreed to incorporate Native American monitoring of ground disturbing activities and cultural sensitivity training prior to construction. The County received a consultation request from the Indian Canyon Mutsun Band of Costanoan Ohlone People in August 2025 after completion of the original environmental review.</p> <p>In December 2025, the County re-initiated tribal consultation to account for the APE expansion, including notification of all Native American tribes previously contacted and continued coordination regarding monitoring and cultural sensitivity measures. Following notice to tribes regarding the expanded project APE, the Indian Canyon Mutsun Band formally requested consultation in January 2026. Subsequent consultation meetings in March 2026 addressed grading extent, construction monitoring, cultural sensitivity training, treatment of discoveries, and opportunities for tribal involvement. The applicant agreed to engage the Indian Canyon Mutsun Band of Costanoan Ohlone People to provide monitoring and training services if the Costanoan Rumsen Carmel Tribe is unavailable.</p> <p>The combined identification and evaluation efforts did not identify any historic properties within the expanded APE and supported the continued finding of No Historic Properties Affected. The County sent a letter to the State Historic Preservation Officer (SHPO) on April 1, 2026, requesting concurrence and no response from the SHPO was received within the 30-day response period or to date; therefore, the County’s Section 106 obligations are complete (see Attachment 9).</p> |
| Noise Abatement and Control  | <p><b>Analysis updated.</b> Due to the revised site plan and building configuration, as well as the expanded project site boundary, the HUD noise analysis was re-run and determined that all exterior building façades would remain at or below HUD’s acceptable noise threshold of 65 dBA. See Attachment 10.</p>   |
| Sole Source Aquifers   | <p><b>No change.</b> The additional parcel is adjacent to the project site and a similar distance from sole-source aquifers.</p>  |
| Wetlands Protection  | <p><b>National Wetland Inventory (NWI) map updated.</b> Like the original project site, no wetlands are located on or near the additional parcel (see Attachment 11).</p>   |
| Wild and Scenic Rivers   | <p><b>No change.</b> The additional parcel is adjacent to the original project site and a similar distance from wild and scenic rivers.</p>   |
| <b>Environmental Assessment Factors</b>  |   |
| <b>Land Development</b>  |   |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | <p><b>No change.</b> The addition of the adjacent parcel does not change the Land Development conclusions identified in the original EA. The additional parcel is currently zoned Single-Family Residential (R-1-6) and has a General Plan land use designation of Urban Low-Density Residential (R-UL). The County of Santa Cruz has included the adjacent parcel in its Annual County Code Amendments process and it will be rezoned to Multi-Family Residential (RM-1.5) and designated Urban High-Density Residential (R-UH), consistent with the zoning and land use designation of the original parcel. The scale and urban design would remain compatible with the surrounding neighborhood, with a three-story craftsman style building set back from adjacent residential</p>  |

**Table 2. Re-Evaluation Summary**

| Topic  | Summary of Changes to ERR  |
|--|--|
|  | properties. The building would be oriented along the southern property line, adjacent to Chanticleer County Park, allowing for increased setback distances from residences to the north.   |
| Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff | <b>No change.</b> The revised site plan slightly increases impervious area due to a larger project site size, but compliance with County Design Criteria, stormwater LID measures, and NPDES/SWPPP requirements remain unchanged. The addition of the adjacent parcel does not result in changes to soil suitability, slope stability, erosion potential, drainage conditions, or storm water runoff impacts. The expanded project site remains suitable for development, and all impacts would continue to be addressed through standard design, engineering, and regulatory compliance measures. |
| Hazards and Nuisances including Site Safety and Noise          | <b>No change.</b> The project modifications do not introduce new hazards or noise sources. The updated Phase I ESA, HUD noise analysis, and ASD evaluation remain consistent with the original findings.   |
| <b>Socioeconomic</b>   |  |
| Employment and Income Patterns                                 | <b>No change.</b> The revised project is still residential and similar in scale, resulting in a net increase of 6 units over the previously proposed design; no change to employment and income patterns.  |
| Demographic Character Changes, Displacement                    | <b>No change.</b> No change to demographic character or displacement would occur. One existing residence, acquired from a willing seller, would be demolished to accommodate the project. Compared to the original project, the revised project would result in a net increase of 6 residential units.   |
| <b>Community Facilities and Services</b>                       |  |
| Educational and Cultural Facilities                            | <b>No change.</b> The project would be served by the same educational and cultural facilities described in the EA. The net increase of 6 residential units would result in a negligible change in school-aged children that would be served by the project and the previous analysis remains valid.  |
| Commercial Facilities  | <b>No change.</b> The project would be served by the same commercial facilities described in the EA and the previous analysis remains valid.   |
| Health Care and Social Services                                | <b>No change.</b> Project occupants would have access to the same health care and social services described in the EA and the previous analysis remains valid.   |
| Solid Waste Disposal / Recycling                               | <b>No change.</b> The project would be served by the same solid waste disposal and recycling facilities described in the EA and the previous analysis remains valid.   |
| Waste Water / Sanitary Sewers                                  | <b>No change.</b> The project would be served by the same wastewater and sanitary sewer services described in the EA and the previous analysis remains valid.  |
| Water Supply   | <b>No change.</b> As described in the EA, the project would be connected to the City of Santa Cruz’s public water system and the previous analysis remains valid.  |
| Public Safety - Police, Fire and Emergency Medical             | <b>No change.</b> The project would be served by the same police, fire, and emergency medical services described in the EA and the previous analysis remains valid.  |
| Parks, Open Space and Recreation                               | <b>No change.</b> The net increase of 6 residential units would result in a negligible increase in demand for parks, open space, and recreational facilities. Project occupants would have access to the County’s extensive parks, open space, and recreation resources as described in the EA. The revised project uses the adjacent park instead of building an on-site play area, but demand would not exceed park capacity or capacity of other recreational resources in the project area. The previous analysis remains valid.   |

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| Topic                                    | Summary of Changes to ERR  |
|--|--|
| Transportation and Accessibility         | <b>No change.</b> The proposed project remains consistent with vehicle miles traveled screening assumptions as a 100% affordable residential infill project. Project occupants would have access to the same transit, bicycle, and pedestrian facilities as described in the EA and the original analysis remains valid.   |
| <b>Natural Features</b>                  |  |
| Unique Natural Features, Water Resources | <b>No change.</b> The additional parcel, like the original project site, is in a developed residential area and does not contain any unique natural features or water resources.   |
| Vegetation, Wildlife                     | <b>No change.</b> The revised footprint remains entirely within previously disturbed/developed areas. The additional parcel, like the original project site, does not contain native vegetation or critical habitat for any special-status species. Mitigation identified in the original environmental review for the protection of nesting migratory bird species, if present in vegetation on and near the site, remains applicable to the project. |
| Other Factors                            | <b>No change.</b> Like the original project, the revised project would provide needed affordable housing, representing a community benefit. No other factors would affect the project.   |
| <b>Energy</b>                            |  |
| Energy Efficiency                        | <b>No change.</b> As with the original project, the revised project would be required to comply with applicable building energy efficiency standards.  |

## Mitigation Measures and Conditions

Mitigation measures related to radon (MM-TOX-1), archaeological monitoring (MM-CUL-1 through MM-CUL-3), and nesting birds (MM-BIO-1) remain applicable to the project. No new mitigation is required as a result of the revised project design. However, additional measures (MM-CUL-1A, MM-TCR-1 and MM-TCR-2) have been added to the project’s conditions following Section 106 consultation with tribes. As part of the original environmental review, the SHPO completed its review and issued no objection prior to consultation with tribes, as no tribes requested consultation during the 30-day notification period. These additional measures are subsequently incorporated into the project not to address an identified significant effect, but rather to reflect the outcomes of tribal consultation and to demonstrate respect for and responsiveness to tribal input. The project’s complete list of applicable mitigation measures is presented in Table 3.

**Table 3. Mitigation Measures and Conditions**

| Law, Authority, or Factor          | Mitigation Measure  |
|------------------------------------|---|
| Contamination and Toxic Substances | <b>MM-TOX-1: Post-Construction Radon Evaluation.</b> In accordance with Section 9.6.3.2 of HUD’s Multifamily Accelerated Processing (MAP) Guide (revised March 19, 2021), after completion of construction and issuance of the occupancy certificate for the project and before residents move in, indoor radon testing shall be conducted for 100% of ground-contact units and 10% of units on each floor above ground level in all buildings included in the project. Testing shall be performed by, or under the direct supervision of, a licensed |

**Table 3. Mitigation Measures and Conditions**

| Law, Authority, or Factor | Mitigation Measure   |
|---------------------------|--|
|                           | <p>Radon Professional certified by the American Association of Radon Scientists and Technologists (AARST), National Radon Proficiency Program (NRPP) or the National Radon Safety Board (NRSB). Radon testing shall follow the AARST Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings (ANSI-AARST MAMF-2017).</p> <p>If testing determines that indoor radon levels are or may be above the U.S. EPA’s threshold for unacceptability of 4.0 pCi/L, then the project applicant must implement a radon mitigation plan. The mitigation plan must identify the radon level on site, describe the radon reduction system that will be installed, establish an ongoing maintenance plan, establish a reasonable timeframe for system implementation, and require post-installation testing by a licensed radon professional.</p> <p>A radon report shall be prepared and submitted at final completion inspection, and shall document the results of testing performed, the sampling strategy, the details of any mitigation deemed necessary, and the timing of any such mitigation. Indoor radon levels must be demonstrated to be below the EPA action level of 4.0 pCi/L prior to project occupancy. Incoming project occupants shall be informed of radon mitigation activities.</p>  |
| Historic Preservation     | <p><b>MM-CUL-1: Archaeological Monitoring during Initial Ground-Disturbing Phases of Construction.</b> Initial ground-disturbing activities shall be observed by a qualified professional archaeologist either meeting the U.S. Secretary of the Interior’s Professional Qualifications and Standards, or under the direction of an archaeologist who meets the U.S. Secretary of the Interior’s Professional Qualifications and Standards. Archaeological monitors shall be commissioned by the County and paid for by the Project applicant. If archaeological resources are encountered, MM-CUL-2 shall apply. Archaeological monitoring may be reduced or halted at the discretion of the monitor as warranted by conditions such as encountering bedrock, ground disturbance occurring in fill, or other indications that discovery is extremely unlikely.</p> <p><b>MM-CUL-1A: Worker Environmental Awareness Training (WEAT).</b> Dudek shall prepare a WEAT informational pamphlet for project contractors with information about cultural resources, relevant regulations, and procedures to follow if a potential cultural resource is identified during construction. An in-person WEAT training shall be conducted by a qualified archaeologist either meeting the U.S. Secretary of the Interior’s Professional Qualifications and Standards, or under the direction of an archaeologist who meets the U.S. Secretary of the Interior’s Professional Qualifications and Standards, prior to construction.</p> <p><b>MM-CUL-2: Inadvertent Discovery of Cultural, Historic, or Archaeological Resources during Construction.</b> If archaeological/cultural resources are discovered during grading or construction activities, all further excavation, disturbance, and work within 200 feet of the discovery must immediately cease and the planning director shall cause an on-site inspection of the property to be made. The purpose of the inspection shall be to determine whether the discovery is of an archaeological resource or cultural resource. The planning director shall notify a representative from the local Native California Indian groups and the property owner. (Santa Cruz County Code (SCCC): 16.40.040 Work shall not resume until an archaeological site development has been approved in accordance with Chapter 18.10 SCCC, Level III (SCCC: 16.40.050).</p> <p><b>MM-CUL-3: Inadvertent Discovery of Human Remains.</b> If human remains are discovered at any time, work in that area should be halted and procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) should be followed, beginning with notification to the Santa Cruz County Coroner. If</p> |

**Table 3. Mitigation Measures and Conditions**

| Law, Authority, or Factor | Mitigation Measure  |
|---------------------------|---|
|                           | <p>Native American remains are present, the County Coroner will contact the Native American Heritage Commission to designate a Most Likely Descendent, who will be authorized to make recommendations regarding the treatment of Native American human remains and associated materials. Further, federal regulations require that Native American human remains, funerary objects, and objects of cultural patrimony are handled consistent with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) for all discovery situations in accordance with 43 CFR 10.</p> <p><b>MM-TCR-1: Cultural Sensitivity Training.</b> A Native American monitor will provide a cultural sensitivity training to work crews prior to commencement of construction activities.</p> <p><b>MM-TCR-2: Native American Monitoring during Ground-Disturbing Phases of Construction.</b> Ground-disturbing activities shall be observed by a Native American Monitor. If archaeological resources are encountered, MM-CUL-2 shall apply. Native American monitoring may be reduced or halted in consultation with the qualified archaeologist and the County.</p>   |
| Vegetation, Wildlife      | <p><b>MM-BIO-1: Pre-Construction Nesting Bird Survey.</b> Vegetation clearing should be conducted outside of the nesting season (January 1 through October 31). If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a pre-construction nesting bird survey within three days prior to any disturbance to the project site. Site disturbance includes disking, demolition activities, vegetation removal and grading. If active nests are identified, the biologist shall establish appropriate avoidance buffers around the nest (based on the species detected), and the buffer areas shall be avoided until the nests are no longer occupied (through routine nest monitoring by the qualified biologist) and the juvenile birds can survive independently from their nest(s). In addition, if portions of the project site have not been disturbed within three days after the initial nesting bird survey, additional nesting bird surveys will be conducted (within the nesting bird season, January 1 through October 31) until all portions of the project site have been disturbed appropriately (as determined by a qualified biologist) as to not provide potential nesting habitat.</p> |

## Conclusion

An EA for the project was completed, and a FONSI was published in June 2025. After completion of the original environmental review, the scope of the project changed to include an additional parcel and associated revised project design, requiring the original review to be re-evaluated. These revisions include changes to the project site boundary, unit count, parking configuration, and amenity layout. Pursuant to 24 CFR § 58.47, the Responsible Entity (County of Santa Cruz) has conducted a re-evaluation of the EA and FONSI issued in June 2025 for the 2021 Chanticleer Avenue Affordable Housing Project. All compliance factors and EA factors have been reconsidered in light of the proposed project revisions, and no new significant impacts or changes in impact severity were identified. The ERR has been updated to include this memorandum and attachments herein. Based on the findings of this review, the original findings are still valid. Therefore, the original FONSI remains valid, and no supplemental EA or EIS, or further publication of a FONSI notice, is required. Accordingly, the Responsible Entity determines that the environmental findings issued in June 2025 continue to satisfy the requirements of NEPA and 24 CFR Part 58, and that the project may proceed under the previously issued AUGF, subject to continued implementation of all applicable mitigation measures.

MEMORANDUM

SUBJECT: NEPA RE-EVALUATION OF 2021 CHANTICLEER AVENUE AFFORDABLE HOUSING PROJECT

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## Determination of Re-Evaluation

- The original FONSI remains valid. No supplemental EA or EIS is required.
- A Supplemental EA is required.
- A Supplemental EIS is required.

## Certification

Preparer Signature: Catherine Wade Date: 5/21/2026

Name/Title/Organization: Catherine Wade, PhD, Project Manager, Dudek

Certifying Officer Signature:  Date: 5/21/2026

Name/Title: Stephanie Hansen, Assistant Director, Community Development and Infrastructure