

3.0 CHANGES TO DRAFT EIR

IN THIS SECTION:

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Changes to Draft EIR text that are identified below are shown in underlined type for new text and ~~strikeout~~ type for deleted text.

3.1 CHANGES TO "Project Description" SECTION

Page 3-6 Correct typo at end of Objective 10:dinners, weddings, and proms.

Pages 3-12 Correct typos for Special Use Permit, Zoning Administrator Approvals and
& 3-13 Revise Development Agreement as follows:

- *Special Use Permit* – Required pursuant to Municipal Code Section 24.12.290-4 ~~of the Santa Cruz Municipal Code~~ to qualify for a 10 percent reduction in the on-site parking supply for cooperative parking facilities.
- *Zoning Administrator Approval for Reduction in Parking Requirements for Nonautomobile Use Programs* – Required pursuant to Municipal Code Section 24.12.290-7 ~~of the Santa Cruz Municipal Code~~ to qualify for a 10 percent reduction in the on-site parking supply for commercial or industrial developments that include measures such as staggered work hours, provision of employee bus passes, provision of van/car pool programs or the like and provide enforceable permanent agreements to carry out the program.
- *Development Agreement* – To establish permit expiration timelines and to vest the project under the codes in effect at the time of project approval. The Development Agreement will vest the development approvals, provide long-term assurances of project development and, in exchange, would obligate the property owner to comply with specified requirements and conditions. Key provisions of the Development Agreement include vesting rights, term (10 years), and fee provisions.

- Page 3-7 Revise the second sentence of the second full paragraph for clarification as follows:

Due to the ~~change in slightly sloping site topography and~~ elevation, the Project contains six levels with two underground parking levels.

3.2 CHANGES TO “Aesthetics” SECTION

- Page 4.1-2 Add the following after the first sentence of the first full paragraph:

The project site is located below the Beach Hill neighborhood, which is identified as an “urban skyline” in the City’s LCP (Map CD-3). LCP Program 3.5.4 also requires maintenance of “the prominence of Beach and Mission hills when development is proposed on or near them.”

- Page 4.1-10 Add the following new paragraph after the second paragraph of the Impact 4.1-1 discussion as follows:

Program 3.5.4 calls for maintenance of the “prominence” of Beach Hill when development is sited on or near it. The proposed project is not located on or adjacent to Beach Hill. The B/SOL Area Plan identifies the Beach Hill subarea’s southern boundary as being defined by Second Street, which is not adjacent to the project site. Nonetheless, the project will not affect the prominence or visibility of Beach Hill. There are limited areas where the La Bahia site is visible within the viewshed of Beach Hill. From the Wharf, most of the area visible behind the La Bahia site consists of structures located along First Street, which although they would mostly be blocked by the proposed project, are not considered part of Beach Hill subarea of the B/SOL Area Plan. The remainder of Beach Hill is not prominent from this location, although a portion of the upper level of an existing Victorian building north of Second Street is visible as part of the mid-range view and would be blocked with development of the proposed project. However, this is a limited view that would not change the “prominence” of Beach Hill, which is not a prominent or significant visual feature from this vantage point. Some structural development on Beach Hill is visible from West Cliff Drive. However, the proposed project would not affect these views, and in both cases, the prominent background views consist of the distant mountains. See the photosimulations in Figures 2-2 and 2-3.

- Page 4.1-13 Revise the third, fourth and fifth sentences of the last paragraph as follows:

While City staff will provide a thorough review of project with the Design Guidelines as part of the staff report for the project, a preliminary review by City Planning Department staff indicates that the project is consistent with applicable guidelines, including the key requirements set forth for the architectural style in the Design Guidelines and in the RTC zone district. The project provides a 12-foot floor to ceiling height for street level commercial spaces, which is consistent with the minimum specified in the Design Guidelines.

~~However, the zoning regulations require a only guideline that is not met is the minimum 15 foot floor to ceiling height for street level commercial spaces. as the project proposes 12 feet. This exception is part of the PD Permit request.~~

3.3 CHANGES TO “Historical Resources” SECTION

- Page 4.2-10 Expand the second sentence of the first paragraph regarding summary of the 1984 historical review of the La Bahia site as follows:

The 1984 evaluation noted that the Historic Building Survey rating for La Bahia was primarily based on architectural significance; had historical significance been included as part of the survey, the score could have reached into the category of “Exceptional” (Archaeological Consulting and Research Services, October 1984).

- Page 4.2-10 Revise the first sentence of the second full paragraph as follows:

The Historic Architecture Assessment completed by Ward Hill in 1996 in conjunction with the B/SOL Area Plan concluded that “it is likely that the La Bahia Apartments appeared to be is eligible for listing on the National Register under criterion c at a local level of significance,” of Historic Places and the building also “appears to be eligible for the California Register of Historical Resources, and as a Santa Cruz Landmark.”

- Page 4.2-10 Revise the second sentence of the last paragraph as follows:

The B/SOL Area Plan recommends development of the La Bahia site as into a “quality” hotel conference center, “retaining the architectural ‘character-defining elements’ identified in the Architectural Resources Group study and incorporating the amenities necessary to be competitive regionally. report: According to ARG’s architectural and development analysis, the major contributing elements include: buildings along the south elevation (Beach Street), both courtyards, the building elevations surrounding the courtyards and the passages into the courts, as well as the scale, massing, and building’s details (City Santa Cruz, October 1998).

- Page 4.2-11 Add the following text prior to the “Current Evaluation for EIR” subsection:

It is also noted that the B/SOL Area Plan identifies two recommendations to develop a “Heritage Tourism” marketing and funding strategy, “emphasizing historic assets of the Wharf, the Boardwalk, surrounding neighborhoods – particularly Beach Hill and Downtown neighborhoods.” In setting forth this recommendation, the Plan states that:

“The planning process has identified the great strength of Santa Cruz’s rich historic legacy in the Beach Area and has specifically designed recommendations which build upon it. Among its major historic assets are:

- the Boardwalk: the last remaining Pacific Ocean Park in America, designated a California State Historic Landmark in 1989,
- the 1911 Charles Loof Carousel, a National Historic Landmark,
- the Giant Dipper Roller Coaster, a National Historic Landmark,
- the Santa Cruz Historic Wharf,
- the La Bahia Apartments, listed on the Santa Cruz Historic Building Survey,
- the Southern Pacific Depot, listed on the Santa Cruz Historic Building Survey, and
- the proposed Historic Preservation District of Beach Hill.

The study's recommendations regarding zoning, design guidelines and development standards combine to reinforce the historic underpinnings of the Beach area. The sensitive expansion and reuse of the La Bahia into a quality conference hotel, the review and revitalization of the Wharf, the return of a charming, historically designed open air shuttle will all contribute substantially to recreating the historic ambiance of the Beach's earlier resort style. Linkage with the rebuilt Downtown shopping district is a definite plus."

Page 4.2-18 Clarify wording of Impact 4.2-1 on this page and in the SUMMARY OF IMPACTS (2.0) section as follows:

Impact 4.2-1: Impacts to an Historical Resource, La Bahia, Due to Demolition.

The project will result in demolition of most of the existing structures making up the La Bahia Apartment complex, structures, which is considered an historical resource under CEQA due to its local listing and eligibility for listing in the California and National registers. Demolition will result in a substantial adverse change in the significance of an historical resource.

Page 4.2-18 Revise Mitigation Measure 4.2-1b on this page and in the SUMMARY OF IMPACTS (2.0) section as follows:

4.2-1b –Salvage. Require project applicant to set up a procedure to offer ~~any~~ building features or elements from the La Bahia Apartments that are not used as part of the project or kept by the owner for reuse on the project site or in other locations. The procedure shall be designed and implemented in consultation with the City of Santa Cruz Planning and Community Development Department to provide public information regarding availability of building features or materials for reuse. The focus would be on identifying building features or elements that ~~are~~ (1) are related to the character-defining features identified in the Architectural Resources Group evaluations and (2) can safely and feasibly be removed from the building. Salvage opportunities shall be considered in the following order: (1) on-site reuse opportunities, (2) off-site reuse opportunities, and (3) public display opportunities. Allow demolition to proceed only after any significant historic features or materials have been identified and kept by the owner or offered for salvage, and their removal completed.

Page 4.2-21 Revise Mitigation Measure 4.2-3c on this page and in the SUMMARY OF IMPACTS (2.0) section as follows:

4.2-3c. The ~~proposed~~ project shall be revised to include, if feasible as determined by the City of Santa Cruz, the repair and retention of any remaining wood windows on the bell tower and southeast apartment units. Non-historic metal windows shall be replaced with ~~wood~~ wood windows similar in size and proportion, in keeping with original condition of building and to differentiate the historic building from the new construction, ~~which will feature aluminum windows.~~ New windows shall be differentiated from the historic windows at the bell tower and retained building.

Page 4.2-22 Revise Mitigation Measures 4.2-4a and in the SUMMARY OF IMPACTS (2.0) section as follows:

4.2-4a. Modify the design of the new building at the northeast corner of Beach and Main Streets in order to reduce the prominence and the appearance of massing of the building's third story through measures such as the following and architectural detailing with confirmation through a photosimulation and review by a historic preservation architect prior to issuance of building permits:

- Replace the solid, partial-height wall that serves as the southern and eastern edges of the main ballroom balcony with a wood and/or metal balustrade.
- Move the ~~western and~~ southern edges of the balcony proposed at the southwest corner of this building inward so that it ~~they~~ no longer extends beyond the footprint of the first and second stories.
- Increase the setback of the southern wall of the third floor in order to align the wall with the southern wall of the "connector" that extends between the building and the retained bell tower building. (This entails an increase in the third-floor setback of approximately three feet.)
- Shift the pergola at the third floor balcony northward so that there is at least three feet of clearance between the southern edge of the pergola and the balustrade extending along the southern edge of the balcony.
- Install new landscaping along Beach Street that is similar to the existing palm trees and that will not rise above the level of the bell tower.

Page 4.2-23 Revise Mitigation Measures 4.2-4b on this page and in the SUMMARY OF IMPACTS (2.0) section as follows:

4.2-4b. Reduce a portion of the southernmost bay of the new construction along Westbrook Street to three stories on the southeast corner of the fourth floor, as shown on the illustration in the Draft EIR text, to reduce massing near the historic Bell Tower (removal of up to two rooms).

Page 4.2-26 & 4.2-27 Revise Mitigation Measure 4.2-5a for minor corrections as shown in the SUMMARY OF IMPACTS (2.0) section.

3.4 CHANGES TO “Transportation & Traffic” SECTION

Page 4.3-4 Revise the first three paragraphs under the “Caltrans” subsection as follows:

Caltrans, which has jurisdiction over state highways, endeavors to maintain a target LOS at the transition between LOS C and D. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS (Caltrans, December 2002). Additionally, according to the *Caltrans Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002), if an existing State Highway facility is operating at less than the target LOS, the guide states that the existing LOS should be maintained (Caltrans, 2002).

~~The traffic study utilized the LOS standards contained in the “Transportation Concept Reports” (TCRs) prepared by Caltrans are the long-term planning documents for state highways that (1) evaluate current and projected conditions along the route; (2) establish a twenty-year planning vision or concept; and (3) recommend long- and short-term improvements to achieve the concept. The ability to provide capacity to accommodate rising volumes has become increasingly difficult in California.~~

~~Historically, District 5 targeted a peak hour concept of LOS C or better for state highways (Caltrans, April 2006). According to the *Transportation Concept Report* for Highway 1, the route concept target level of service for State Highway 1 Segment 17, San Andreas Road to State Route 17, east of Morrissey Boulevard is a peak LOS D or better with a six-lane freeway with High Occupancy Vehicle (HOV) lanes. The concept calls for supporting intermodal interconnectivity among highway, transit, rail, and bicycle (Caltrans, April 2006). The concept for Segment 18, State Route 17 junction to Santa Cruz City limits, is peak LOS D or better with a six-lane freeway to Mission/Chestnut Streets and four-lane to six-lane conventional from Mission/Chestnut to Swift Street. The report also indicates that operational improvements, including auxiliary lanes and ramp metering, may be pursued as a means to improve traffic flow on Segment 17 in advance of widening. Additionally, according to the *Caltrans Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002), if an existing State Highway facility is operating at less than the target LOS, the guide states that the existing LOS should be maintained (Caltrans, 2002).~~

~~According to the 2006 *Transportation Concept Report* for Highway 17, route concept target level of service for State Highway 17 between the Ocean Street and Scotts Valley is a peak LOS E or better with operational improvements along a four-lane expressway (Caltrans, January 2006). The Route Concept Report for Highway 17 indicates that widening is not envisioned, and this segment of the highway is considered to be a four-lane freeway (Caltrans, January 2006).~~

Page 4.3-10 & Revise the first sentence and

Page 4.3-16 Revise third sentence of last paragraph as follows:

Currently, a Project Report, preliminary engineering and associated studies are complete, and an Initial Study/Mitigated Negative Declaration will be circulated for public review in July. ~~January 2014 for consideration by the City Council in February 2014.~~

Page 4.3-14 Revise the Impact statement as and in the SUMMARY OF IMPACTS (2.0) section as follows:

Impact 4.3-1: Circulation System Impacts. The project will result in an increase in daily and peak hour trips, but would not cause existing or planned intersections to operate at an unacceptable Level of Service (LOS), and would not adversely affect non-auto modes of transportation. However, project trips would contribute to the existing ~~unacceptable~~ LOS of D at the Mission Street/Bay Street and E at the Highway 1/Highway 9 intersections, both of which are unacceptable levels of service according to Caltrans standards. Therefore, this is a *significant* impact.

3.5 CHANGES TO “Land Use” SECTION

Page 4.7-9 Revise the first paragraph as follows:

The B/SOL Plan Design Guidelines are part of the City’s LCP. City Planning Department staff reviewed all of the General Design Guidelines and the guidelines for the Beach Commercial area, and concluded that the La Bahia project appears to meet all of them. The project provides a 12-foot floor to ceiling height only guideline that is not met is the minimum 15-foot floor to ceiling height for street level commercial spaces, which is consistent with the minimum specified in the Design Guidelines. However, the zoning regulations require 15 feet, as the project proposes 12 feet. This exception is part of the PD Permit request.

3.6 CHANGES TO “Growth Inducement” SECTION

Page 5-2 Revise the title of the section to read: 5.2 GROWTH INDUCEMENT AND ENERGY EFFICIENCY

Page 5-2 Add a subheader under the section title to read: Growth Inducement.

Page 5-3 Add the following new subsection after the Growth Inducement subsection and before the Cumulative Impacts section.

Energy Efficiency

The project will be subject to a number of applicable local and state regulations that promote energy efficiency, as well as itself containing energy-efficient design features, both of which will ensure that the project will efficiently use energy during construction and operation.

With respect to construction, the demolition of existing facilities and construction of the project would require the use of fuels (primarily gas, diesel, and motor oil) for a variety of construction activities, including excavation, grading, demolition, and vehicle travel. The project site has been previously disturbed and developed, and is considered an “in-fill” site for development. As such, the project is not expected to use substantial amounts of fuel for demolition, excavation and grading. The project does not require the construction of new roadways or extensions of utilities. Energy efficiency during construction is also promoted by mitigation measure 4.2-1b, which requires the project applicant to offer any building features or elements from the existing La Bahia Apartments that are not used as part of the project or kept by the owner for reuse in other locations. This mitigation measure, as well as retaining part of the existing building, helps ensure that materials (and the energy needed to produce those materials) are not wasted but instead are reused as feasible.

Operationally, state and local regulations will cause the project to be much more energy efficient per square foot than the existing La Bahia Apartments that were initially constructed in 1926. The proposed project will be constructed in accordance with specifications contained in Title 24 of the California Code of Regulations and the City’s Green Building Regulations, which both require incorporation of energy efficient building designs and measures. Generally, buildings constructed pursuant to state and locally mandated green building and energy efficiency techniques are 50% more energy efficient than the average Santa Cruz structure (City of Santa Cruz, “Climate Action Plan”, adopted October 2012 at pp. 25–26) Given that the La Bahia Apartments are older than the average Santa Cruz structure, the project may be greater than 50% more efficient than the existing buildings. Energy use was factored into the greenhouse gas emissions calculations for the project as discussed on pages 4.5-14 to 4.5-15 of the DEIR, and no significant impacts were identified. Furthermore, the project also includes energy-efficient design features. For example, as indicated on page 4.5-15 of the DEIR, the project incorporates solar panels for pool and spa heating, and some hot water will be recovered via the building’s heating system that will provide a reduction of the annual domestic hot water load.

The applicable state green building standards are the 2013 California Green Building Standards Code, as codified in Title 24, Part 11, of the California Code of Regulations (“Green Building Code”). The Green Building Code specifies sustainable construction requirements in five categories: (1) planning

and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) environmental quality. The Green Building Code applies to the design, operation, construction, replacement, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to building structures throughout California. The City of Santa Cruz has adopted the Green Building Code and will require the project to comply with its standards (Santa Cruz Municipal Code §§ 18.04.030; 24.15.030).

The applicable state energy efficiency standards are in the Energy Efficiency Standards for Residential and Nonresidential Buildings, as codified in Title 24, Part 6, of the California Code of Regulations ("Energy Efficiency Code"). The Energy Efficiency Code adopted in 2013, which is the Code applicable to this project, imposes standard that result in nonresidential construction being 30% more efficient for than it would have been under the 2010 Code.

The project is required to comply with the City's Water-Efficient Landscape Ordinance. (Municipal Code § 16.16.010.) The Water-Efficient Landscape Ordinance has requirements about landscape design and irrigation, including the following: (1) the landscaping must be "composed of very low to moderate water use plants, as identified in Water Use Classification of Landscape Species (WUCOLS Guide) or other species, including native plants that are well adapted to the climate of the region, and require minimal water once established," (2) irrigation systems must "be designed to avoid runoff, overspray, low-head drainage and other similar conditions where water flows off site onto adjacent property, non-irrigated area, walks, roadways, or structures," and (3) irrigation systems must "be equipped with rain-sensing devices to prevent irrigation during rainy weather" and must "provide for the installation of a manual shut-off valve installed as close as possible to the point of connection to minimize water loss in case of an emergency or routine repair." (Municipal Code § 16.16.070.)

Regarding transportation, the project will implement an Alternative Transportation Program, under which the project applicant has committed to the following: (1) being a member in the Ecology Action alternative transportation program or other equivalent program and actively encourages carpooling, transit, and/or bicycle commuting for hotel employees, (2) providing 70 bicycle storage stalls (40 interior stalls and 30 exterior stalls), which is 112% more than required by the zoning code, (3) providing hotel patrons with information to encourage alternative methods of transportation to the hotel and beach area, including, but not limited to, promoting use of the Beach/Downtown Trolley, (4) providing free bus passes to employees, encouraging van and/or carpooling, providing free emergency rides home to employees, and promoting other measures to reduce automobile use, and (5) submitting documentation of implementation of the Alternative Transportation Program prior to issuance of an occupancy permit to the Planning Department and, upon request of the Director of Public Works, providing a report on the status and success of the

program once implemented. (The proposed Alternative Transportation Plan is included in Appendix B of this Final EIR document.)

The applicable state and local requirements listed above that promote energy efficiency, as well as the project's design features such as the Alternative Transportation Program, ensure that the project would use energy efficiently.

3.7 CHANGES TO “Project Alternatives” SECTION

Page 5-20 Correct typo at end of Objective 10:dinners, weddings, and proms.

Page 5-30 Add the following expanded text to Alternative 1 after the “Cumulative Impacts” subsection.

- ▶ **Other Impacts.** The DEIR did not identify other significant impacts than those evaluated above. This alternative would not result in new significant impacts, and would have impacts similar to or less than those identified for the proposed project. The DEIR identified less-than-significant impacts related to aesthetics, air quality, water supply, and traffic (highway impacts, parking, access/emergency access). This alternative would result in fewer hotel rooms than the proposed project, and thus would further reduce the less-than-significant impacts associated with water demand, air quality emissions, and highway traffic and parking. The alternative would retain and rehabilitate the existing buildings with construction of a new building constructed in the rear of the property. The new building would be similar in size and mass as the portion of the project proposed in the rear of the site. Impacts related to aesthetics (scenic views, scenic resources, and light and glare) would not change from the proposed project and would continue to be less-than-significant. The new building area would be reduced with this alternative, which would further reduce the less-than-significant impact associated with degradation of the visual character of the surrounding area.

Other less-than-significant impacts identified in the Initial Study include: biological resources (removal of heritage trees), hydrology (drainage and water quality), noise (increase in noise levels), and public service and utility demands. This alternative would retain the existing building and potentially eliminate the need to remove four heritage trees. The reduced project size under this alternative would further reduce identified less-than-significant public service and utility impacts. The overall building coverage would generally remain the same as with the proposed project, and thus, impacts related to drainage would be similar to those identified for the proposed project. Similarly, the alternative would continue to include underground parking, which minimizes impacts on water quality due to pollutants carried in stormwater. The alternative would eliminate demolition of the existing structures, and thus, would reduce construction-related noise. Neither the proposed project nor any of the alternatives would introduce a substantial source of noise or affect ambient noise levels.

The DEIR and Initial Study did not identify any impacts related to land use. The project site is located within the developed Beach area of the City, and development of the site would not physically divide an established community. The project site is not located within an area covered by an adopted Habitat Conservation Plan or Natural Community Conservation Plan. The DEIR did not identify any project conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Alternative 1, being the same use in the same location as the proposed project, would not result in conflicts with policies or regulations and would not result in new impacts related to land use.

Page 5-34 Add the following expanded text to Alternative 2 after the “Cumulative Impacts” subsection.

- ▶ **Other Impacts.** The DEIR did not identify other significant impacts than those evaluated above. This alternative would not result in new significant impacts, and would have impacts similar to or less than those identified for the proposed project. The DEIR identified less-than-significant impacts related to aesthetics, air quality, water supply, and traffic (highway impacts, parking, access/emergency access). This alternative would result in fewer hotel rooms than the proposed project, and thus would further reduce the less-than-significant impacts associated with water demand, air quality emissions, and highway traffic and parking. The alternative would retain and rehabilitate all but two of the existing buildings with construction of a new building constructed in the rear of the property. The new building would be similar in size and mass as the portion of the project proposed in the rear of the site. Impacts related to aesthetics (scenic views, scenic resources, and light and glare) would not change from the proposed project and would continue to be less-than-significant. The new building area would be reduced with this alternative, which would further reduce the less-than-significant impact associated with degradation of the visual character of the surrounding area.

Other less-than-significant impacts identified in the Initial Study include: biological resources (removal of heritage trees), hydrology (drainage and water quality), noise (increase in noise levels), and public service and utility demands. This alternative would retain all but two of the existing buildings and potentially eliminate the need to remove four heritage trees. The reduced project size under this alternative would further reduce identified less-than-significant public service and utility impacts. The overall building coverage would generally remain the same as with the proposed project, and thus, impacts related to drainage would be similar to those identified for the proposed project. Similarly, the alternative would continue to include underground parking, which minimizes impacts on water quality due to pollutants carried in stormwater. The alternative would reduce the amount of demolition of the existing structures, and thus, would reduce construction-related noise. Neither the proposed project nor any of the alternatives would introduce a substantial source of noise or affect ambient noise levels.

The DEIR and Initial Study did not identify any impacts related to land use. The project site is located within the developed Beach area of the City, and development of the site would not physically divide an established community. The project site is not located within an area covered by an adopted Habitat Conservation Plan or Natural Community Conservation Plan. The DEIR did not identify any project conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Alternative 2, being the same use in the same location as the proposed project, would not result in conflicts with policies or regulations and would not result in new impacts related to land use.

Page 5-36 Add the following expanded text to Alternative 3 after the “Cumulative Impacts” subsection.

- ▶ **Other Impacts.** The DEIR did not identify other significant impacts than those evaluated above. This alternative would not result in new significant impacts, and would have impacts similar to or less than those identified for the proposed project. The DEIR identified less-than-significant impacts related to aesthetics, air quality, water supply, and traffic (highway impacts, parking, access/emergency access). This alternative would result in fewer hotel rooms than the proposed project, which would further reduce the less-than-significant impacts associated with water demand, air quality emissions, and highway traffic and parking. This alternative would retain the same portion of the existing structures as with the proposed project, with construction of a new building of similar mass, although lower height, than the proposed project. Impacts related to aesthetics (scenic views, scenic resources, and light and glare) would not change from the proposed project and would continue to be less-than-significant. The new building area would height would be reduced with this alternative, which would further reduce the less-than-significant impact associated with degradation of the visual character of the surrounding area.

Other less-than-significant impacts identified in the Initial Study include: biological resources (removal of heritage trees), hydrology (drainage and water quality), noise (increase in noise levels), and public service and utility demands. This alternative would retain the same portion of the building as the proposed project and result in construction of a new building, which would not change the less-than-significant impact related to removal of heritage trees. The reduced project size under this alternative would further reduce identified less-than-significant public service and utility impacts. The overall building coverage would generally remain the same as with the proposed project, and thus, impacts related to drainage would be the same as those identified for the proposed project. Similarly, the alternative would continue to include underground parking, which minimizes impacts on water quality due to pollutants carried in stormwater. The alternative would reduce the amount of demolition of the existing structures, and thus, would reduce construction-related noise. Neither the proposed project nor any of

the alternatives would introduce a substantial source of noise or affect ambient noise levels.

The DEIR and Initial Study did not identify any impacts related to land use. The project site is located within the developed Beach area of the City, and development of the site would not physically divide an established community. The project site is not located within an area covered by an adopted Habitat Conservation Plan or Natural Community Conservation Plan. The DEIR did not identify any project conflicts with policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Alternative 3, being the same use in the same location as the proposed project, would not result in conflicts with policies or regulations and would not result in new impacts related to land use.

3.8 CHANGES TO “References” SECTION

Page 6-1 Add the following to the “References” (6.2) subsection.

Archaeological Consulting. November 2001. “Preliminary Archaeological Reconnaissance of Assessor’s Parcel 005-213-02 & -03, Santa Cruz, Santa Cruz County, California.”

City of Santa Cruz. January 8, 2014. Memorandum to Historic Preservation Commission from Janice Lum, Senior Planner, regarding “2012-2013 Annual Certified Local Government (CLG) Program Report.”

National Park Service. “The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings”. Online at:
www.nps.gov/history/hps/tps/standguide/

U.S. Department of the Interior, National Park Service, Technical Preservation Services. 2011. “The Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings. Prepared by Anne E. Grimmer with Jo Ellen Hensley, Liz Petrell, Audrey T. Tepper.

3.9 CHANGES TO “Appendix A” SECTION

Page 28 Change the Impact Analysis regarding heritage trees in the Initial Study as follows:

Impact Analysis. The proposed project in will result in removal of four horticultural trees that are assumed to be heritage trees under City regulations. City regulations require tree replacement for removal of a heritage tree to

consist of replanting three 15-gallon or one 24-inch size specimen for each heritage tree approved for removal. The project landscaping plan shows planting of nine ~~four~~ 24-inch box trees and ten ~~nine~~ 36-inch box trees. Thus, the proposed tree planting would be consistent with heritage tree regulations and replanting requirements for removal of four heritage trees and would not conflict with local tree preservation regulations or result in a significant impact.