

Draft Environmental Impact Report

307 Chestnut Street Residence

State Clearinghouse Number 202606137

September 2026



Prepared for
City of Santa Cruz
Community Development Department

Prepared by
DUDEK

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SEPTEMBER 2026

Prepared for:

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Acronyms and Abbreviations

Acronym/Abbreviation	
ACM	Asbestos-containing material
AMBAG	Association of Monterey Bay Area Governments
ARG	Architectural Resources Group
CDF	Character-defining features
CEQA	California Environmental Quality Act
CHBC	California Historical Building Code
COA	Condition of approval
CRHR	California Register of Historical Resources
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
GHG	Greenhouse gas
Historic District	Santa Cruz Downtown Historic District
LBP	Lead-based paint
MBTA	Migratory Bird Treaty Act
MBARD	Monterey Bay Air Resources District
NOP	Notice of Preparation (of EIR)
MPO	Metropolitan planning organization
MTP/SCS	Metropolitan Transportation Plan/ Sustainable Communities Strategy
NRHP	National Register of Historic Places
PG&E	Pacific Gas and Electric Company
RTP	Regional Transportation Plan
PRC	Public Resources Code
SB	Senate Bill
SCCRTC	Santa Cruz County Regional Transportation Commission
UCSC	University of California Santa Cruz
VMT	vehicle miles traveled

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1 Introduction

1.1 Purpose of the Environmental Impact Report

Under CEQA, the lead agency for a project is the public agency with primary responsibility for carrying out or approving the project, and for implementing the requirements of the California Environmental Quality Act (CEQA). As the CEQA lead agency for the project, the City of Santa prepared this Environmental Impact Report (EIR) pursuant to CEQA (California Public Resources Code section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Title 14, section 15000 et seq.).

As stated in the CEQA Guidelines section 15002, the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Pursuant to CEQA Guidelines section 15121, an EIR is an informational document that is required to (1) identify the potentially significant environmental effects of a project on the environment, (2) indicate the manner in which those significant effects can be avoided or significantly lessened via the implementation of potentially feasible mitigation measures, (3) identify a reasonable range of potentially feasible alternatives to a project that would eliminate or substantially lessen any significant environmental effects, and (4) identify any significant and unavoidable adverse impacts that cannot be mitigated or otherwise reduced. The lead agency must consider the information in the EIR along with other information which may be presented to the agency. While the information in the EIR does not control the ultimate decision about a project, the agency must consider the information in the EIR and respond to each significant effect identified in the EIR by making findings pursuant to Public Resources Code section 21081.

Pursuant to Public Resources Code section 21002, public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which would substantially lessen the significant environmental effects of such projects. Furthermore, pursuant to CEQA Guidelines section 15021, CEQA establishes a duty for public agencies to avoid or minimize environmental damage where feasible. In deciding whether changes in a project are feasible, an agency may consider specific economic, environmental, legal, social, and technological factors. As defined in the CEQA Guidelines, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. This section further indicates that under CEQA, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, in determining whether and how a project should be approved. If an agency decides to approve a project that will cause one or more significant effects on the environment, the agency must prepare a “statement of overriding considerations”

to reflect the ultimate balancing of competing public objectives. The environmental review process is further explained below in Section 1.4.

1.2 Project Overview

The proposed 307 Chestnut Street Residence (Project) consists of a Residential Demolition Authorization Permit, Design Permit and Heritage Tree Removal Permit to demolish an existing single-family dwelling, construct a new single-family dwelling unit, and remove two heritage-sized trees on a parcel located within the Santa Cruz Downtown Historic District. The Project site has a second single-family home that will be retained. A full description of the Project is provided in Section 3, Project Description.

1.3 Scope of the EIR

1.3.1 Review of Environmental Impacts

The focus of the environmental review process is upon significant environmental effects. As defined in section 15382 of the CEQA Guidelines, a “significant effect on the environment” is:

... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether a physical change is significant.

In evaluating the significance of the environmental effects of a project, the State CEQA Guidelines require the lead agency to consider direct physical changes in the environment and reasonably foreseeable indirect physical changes in the environment which may be caused by the project (CEQA Guidelines section 15064[d]). A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project. An indirect physical change in the environment is a physical change in the environment, which is not immediately related to the project, but which is caused indirectly by the project. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

CEQA Guidelines section 15064(e) further indicates that economic and social changes resulting from a project shall not be treated as significant effects on the environment, although they may be used to determine that a physical change shall be regarded as a significant effect on the environment. In addition, where a reasonably foreseeable physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project.

1.3.2 307 Chestnut Street Residence EIR Scope of Work

The City has identified the topics for analysis in the EIR based on the analyses in the June 2026 Initial Study and responses to the EIR Notice of Preparation (NOP). The NOP and comments received on the NOP are included in Appendix A; the Initial Study is included in Appendix B. Based on the analyses in the Initial Study and responses to the NOP (as discussed below), this EIR evaluates potentially significant impacts for the following topics: cultural-

historical resources. The EIR also evaluates topics required by CEQA and CEQA Guidelines for all EIRs, including growth inducement, project alternatives, and cumulative impacts. Other issues not included in the EIR are evaluated in the Initial Study, which is included in Appendix B and also is available for review on the Planning Department's website at: <https://www.santacruzca.gov/Government/City-Departments/Community-Development/Current-Planning/Environmental-ReviewCEQA>.

1.4 Environmental Review and Project Approval Process

1.4.1 Scoping

The CEQA Guidelines section 15083 authorizes and encourages an early consultation or scoping process to help identify the range of actions, alternatives, mitigation measures, and significant effects to be analyzed and considered in an EIR, and to help resolve the concerns of affected regulatory agencies, organizations, and the public. Scoping is designed to explore issues for environmental evaluation, ensuring that important considerations are not overlooked and uncovering concerns that might otherwise go unrecognized.

Pursuant to CEQA Guidelines section 15082, a Notice of Preparation (NOP), which is included in Appendix A, was published on July 1, 2026 for a 30-day review period for the proposed Project. The NOP identifies the scope and extent of environmental issues to be addressed in this EIR. The NOP was circulated to the State Clearinghouse and to local, regional, and federal agencies in accordance with State CEQA Guidelines. The NOP also was sent to organizations and interested citizens that have requested notification in the past. Written comments were received in response to the NOP from one public agency (California Department of Toxic Substances Control). These letters are included in Appendix A. The comments have been taken into consideration in the preparation of this EIR for comments that address environmental issues. To the extent that issues identified in public comments involve potentially significant effects on the environment according to the CEQA, and/or were raised by responsible and trustee agencies, they are identified and addressed in this EIR.

1.4.2 Public Review of Draft EIR

The Draft EIR will be distributed for a 45-day public review period from September 2, 2026 to October 16, 2026. The Draft EIR will be available for public review during the comment period at the following locations:

- Online at:
<https://www.santacruzca.gov/Government/City-Departments/Community-Development/Current-Planning/Environmental-ReviewCEQA>
- City of Santa Cruz Community Development Department, 809 Center Street, Room 101, Monday through Thursday from 7:30 AM to 11:30 AM.

During the public review period, written comments on the Draft EIR can be submitted by all interested public agencies, organizations, community groups, and individuals to the following Rina Zhou by mail or email at the addresses below no later than 5 pm on October 16, 2026.

Rina Zhou, Senior Planner
rzhou@santacruzca.gov
City of Santa Cruz Community Development Department
809 Center Street, Room 101, Santa Cruz, California 95060

The City of Santa Cruz encourages public agencies, organizations, community groups, and all other interested persons to provide written comments on the Draft EIR prior to the end of the 45-day public review period. Section 15204(a) provides guidance on the focus of review of EIRs, indicating that in reviewing draft EIRs, persons and public agencies “should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated,” and that comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. This section further states that: “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

1.4.3 Final EIR and Consideration of Project Approval

Following the close of the public and agency comment period on this Draft EIR, responses will be prepared for all comments received during the public review period that raise CEQA-related environmental issues regarding the Project. The responses will be published in the Final EIR document. The Final EIR will include written responses to any significant environmental issues raised in comments received during the public review period in accordance with State CEQA Guidelines section 15088. The Final EIR document also will include Draft EIR text changes and additions that become necessary after consideration of public comments.

The Final EIR, which will include both the Draft and Final EIR documents, will be presented to the City decision-making body. Pursuant to CEQA Guidelines section 15356, the “decision-making” body means any person or group of people within a public agency permitted by law to approve or disapprove a project. For the proposed Project, the City Zoning Administrator would make the final decision on certification of the EIR and whether to approve the proposed 307 Chestnut Street Residence. Pursuant to Chapter 24.08 of the City Municipal Code, approval of the requested Project permits would be by the City Zoning Administrator. The Zoning Administrator must ultimately certify that it has reviewed and considered the information in the EIR, that the EIR has been completed in conformity with the requirements of CEQA, and that the document reflects the City’s independent judgment. When EIR is certified by a non-elected decision-making body, the certification may be appealed to the lead agency’s elected decision-making body (CEQA Guidelines section 15090(b)).

Pursuant to sections 21002, 21002.1 and 21081 of CEQA and sections 15091 and 15093 of the State CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects on the environment.
 - 2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by such other agency.
 - 3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

Although these determinations (especially regarding feasibility) are made by the public agency's final decision-making body based on the entirety of the agency's administrative record as it exists after completion of a Final EIR, the Draft EIR must provide information regarding the significant effects of the proposed project and must identify the potentially feasible mitigation measures and alternatives to be considered by that decision-making body.

1.4.4 Adoption of Mitigation Monitoring and Reporting Program

CEQA requires that a program to monitor and report on mitigation measures be adopted by a lead agency as part of the project approval process. CEQA requires that such a program be adopted at the time the agency approves a project or determines to carry out a project for which an EIR has been prepared to ensure that mitigation measures identified in the EIR are implemented. The Mitigation Monitoring and Reporting Program proposed for adoption by the City will be included in the Final EIR, although it is not required to be included in the EIR.

1.5 Contents of the EIR

The content and format of this EIR are designed to meet the requirements of CEQA and the CEQA Guidelines (sections 15122 through 15132). This Draft EIR is organized in the following chapters:

- **Chapter 1, Introduction**, explains the CEQA environmental review process; describes the purpose and scope of the EIR; provides information on the review and approval process; and outlines the organization of the Draft EIR document.
- **Chapter 2, Summary**, presents an overview of the Project; identifies known areas of controversy or concern; summarizes alternatives evaluated in the EIR; provides a summary of the impacts of the Project and mitigation measures for identified significant impacts; and identifies issues to be resolved.
- **Chapter 3, Project Description**, provides information about the location, setting, and background for the Project; identifies Project-specific objectives; and provides a detailed description of the Project elements and components. identifies intended uses of the EIR;
- **Chapter 4, Environmental Setting, Impacts, and Mitigation Measures**, explains the approach to the environmental analysis for this EIR, and provides environmental setting, impacts, and mitigation measures for the topics identified for inclusion in the EIR. Each topical section in this Draft EIR presents information in three parts. The "Environmental Setting" section provides an overview of the existing conditions on and adjacent to the Project site. Local, state and federal regulations also are identified and discussed, when relevant.

The "Impacts and Mitigation Measures" section provides an outline of the criteria used to evaluate whether an impact is considered significant based on standards identified in the CEQA Guidelines. Agency policies or regulations and/or professional judgment also are used to further define what actions may cause significant effects. Any Project feature or element that may cause impacts, as well as Project features that may serve to eliminate or reduce impacts, will be identified and addressed for both direct and reasonably foreseeable indirect impacts. Mitigation measures that would reduce significant impacts are identified. The

significance of the impact after mitigation also is identified. For impacts found to be less-than-significant, mitigation measures are not required, but where relevant, the EIR recommends Project modifications or appropriate conditions of approval.

- **Chapter 5, Other CEQA Considerations**, evaluates the topics required to be included in an EIR, including significant unavoidable impacts, irreversible impacts, growth inducement, cumulative impacts, and alternatives to the Project.
- **Chapter 6 References and EIR Preparation**, identifies all agencies and persons contacted during the preparation of the Draft EIR, all references that were cited or utilized in preparation of the Draft EIR and individuals who were involved in preparing this Draft EIR.
- **Appendices** contain additional information used in preparing this Draft EIR. Appendix A contains the NOP and the comment letters that were submitted in response to the NOP. Appendix B includes the Initial Study. Appendix C includes historical resources reports prepared for the Project, and Appendix D includes information on the Santa Cruz Downtown Historical District.

2 Summary

2.1 Introduction

This chapter provides an overview of the proposed 307 Chestnut Street Residence Project, known areas of controversy or concern, project alternatives, all potentially significant impacts identified during the course of this environmental analysis, and issues to be resolved. This summary is intended as an overview and should be used in conjunction with a thorough reading of the EIR. The text of this report, including figures, tables and appendices, serves as the basis for this summary.

2.2 Project Overview

The proposed 307 Chestnut Street Residence Project (Project) consists of a Residential Demolition Authorization Permit, Design Permit and Heritage Tree Removal Permit to demolish an existing single-family dwelling, construct a new single-family dwelling unit, and remove two heritage-sized trees on a parcel located within the Santa Cruz Downtown Historic District. The Project site has a second single-family home that will be retained. A full description of the Project is provided in Section 3, Project Description.

2.3 Areas of Controversy or Concern

A Notice of Preparation (NOP) for this EIR was circulated for a 30-day comment period on July 1, 2026. Written comments were received in response to the NOP from one public agency (Department of Toxic Substances Control). This letter is included in Appendix A and addresses regulatory requirements for demolition of structures that may contain asbestos, lead-based paint and other toxic materials.

2.4 Summary of Alternatives

CEQA Guidelines require that an EIR describe and evaluate alternatives to the project that could eliminate significant adverse project impacts or reduce them to a less-than-significant level. The following alternatives are evaluated in Section 5.5.

- No Project – Required by CEQA
- Alternative 1 – Full Rehabilitation
- Alternative 2 – Partial Preservation

Table 5-1 in Section 5.5 of this EIR presents a comparison of impacts of the proposed Project and the alternatives. Excluding the No Project Alternative, Alternative 1 is considered the environmentally superior alternative for the purpose of the CEQA evaluation of the alternatives reviewed but the feasibility of this alternative is uncertain.

2.5 Summary of Impacts and Mitigation Measures

All impacts identified in the subsequent environmental analyses are summarized in this section. This summary groups impacts of similar ranking together, beginning with significant unavoidable impacts, followed by significant impacts that can be mitigated to a less-than-significant level, followed by impacts not found to be significant. The discussions in the Initial Study of impacts that are not being addressed in detail in the text of the Draft EIR are intended to satisfy the requirement of CEQA Guidelines section 15128 that an EIR “shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR.” The Initial Study is included in Appendix A of this EIR. A summary of less-than-significant and no impacts identified in the Initial Study is presented at the end of this section.

2.5.1 Significant Unavoidable Impacts

The following impacts were found to be potentially significant, and while mitigation measures have been identified in some cases, the impact cannot be reduced to a less-than-significant level.

Impact CUL-1 The Project would cause a substantial adverse change in the significance of a historical resource at 307 Chestnut Street that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in CEQA Guidelines section 15064.5. (*Significant*)

Mitigation Measures

CUL-1 **HABS-like Documentation.** The City shall ensure the preparation of HABS-like Level II documentation for both 307 Chestnut Street and the Santa Cruz Downtown Historic District prior to the issuance of any Project related permitting or construction. The HABS-like documentation shall be completed and submitted to the identified repositories within nine months of the environmental document being certified and prior to the issuance of any Project related permitting or construction. All work shall be prepared by an architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards for architectural history and/or history (36 Code of Federal Regulations, Part 61). The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for a HABS Short Format for a Level II as shown in *HABS History Guidelines Updated October 2023*. This mitigation measure is being proposed in compliance with CEQA and does not necessitate consultation or approval of the documentation by NPS or the State Historic Preservation Officer. Archival CD/DVD containing a PDF of the written documentation and the photographs (prepared and indexed as outlined below) shall be produced according to the NPS standards identified in *HABS History Guidelines Updated October 2023*. The documentation and photographs shall be distributed to the City of Santa Cruz Community Development Department, the Santa Cruz Museum of Art & History, the Local History Room of the Santa Cruz Public Library, and the Northwest Information Center of the California Historical Resources Information System. The HABS-like Level II short format documentation shall be limited to the following:

- **HABS-like Level II Short Form Report:** A written narrative historical report, per *HABS History Guidelines Updated October 2023* shall include historical information, including the physical history and historic context of 307 Chestnut Street and the Santa Cruz Downtown Historic District, and an architectural description of the setting and exterior of the building of 307 Chestnut, the District, and each contributing resource to the District. The report shall be

prepared by a qualified professional who meets the standards for history or architectural history set forth by the Secretary of the Interior's Professional Qualification Standards. Archival copies of the drawings, photographs, and report shall be submitted to the Community Development Department, and to repositories including but not limited to the Santa Cruz Museum of Art & History, the Local History Room of the Santa Cruz Public Library, the Northwest Information Center, and California Historical Society. This mitigation measure would create a collection of reference materials that would be available to the public and inform future research.

The written documentation shall be printed on archival paper according to NPS standards for HABS documentation. Archival CD/DVD containing a PDF of the written documentation and photographs shall be produced according to NPS standards.

- **Photographs:** Digital photographs shall be completed prior to issuance of any Project related permitting or construction. Photograph documentation shall be prepared according to the NPS *National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy 2024*. The photographer shall be familiar with the NPS photograph policy and work with a qualified architectural historian or historian. A minimum of 10 photographs must be taken of 307 Chestnut Street which shall include the overall parcel, all elevations of the building, existing setting, surrounding viewsheds, and character-defining details. No interior spaces (communal or private living spaces) are required. A minimum of two overview photographs of the District's main thoroughfares shall be taken. The views will be directed by the architectural historian or historian working with the photographer. A minimum of two photographs of each contributing resource to the District must be taken, which will include one oblique and one straight-on view of the main façade of the resources. No interior spaces (communal or private living spaces) are required for the District and its contributors. Photographs shall be indexed according to NPS *National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy 2024*.

2.5.2 Significant Impacts

The following impacts were found to be potentially significant but could be reduced to a less-than-significant level with implementation of identified mitigation measures.

Impact CUL-2 The Project would potentially cause a substantial adverse change in the significance of the Santa Cruz Downtown Historic District that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in CEQA Guidelines section 15064.5. (*Significant*)

Mitigation Measures

CUL-2 **Historic Monitoring Plan.** Prior to issuance of grading, demolition, or building permits, the applicant shall retain a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for architectural history and/or history (36 Code of Federal Regulations, Part 61).

The architectural historian shall prepare a Historic Monitoring Plan (HMP) for review and approval by the City. The HMP shall be implemented as specified below and shall include, at a minimum:

- **Design Review and Conformance Evaluation.** Prior to permit issuance, the architectural historian shall review the final construction drawings and associated project plans to confirm that the final design remains consistent with the character-defining features of the Santa Cruz Downtown Historic District and conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including Standards 9 and 10 governing new construction within historic districts.
- **Historic Resource Protection Measures.** The HMP shall identify measures to prevent inadvertent damage to nearby historic resources and Historic District features during demolition and construction activities and shall establish protocols for communication with the City should unanticipated historic-resource issues arise.
- **Construction-Phase Monitoring and Consultation.** The architectural historian shall remain available throughout demolition and construction activities to review any project modifications, unforeseen conditions, or design changes that may affect the Historic District and provide recommendations to ensure continued conformance with the Secretary of the Interior's Standards.
- **Treatment of Unanticipated Conditions.** The HMP shall establish procedures for the review and resolution of unanticipated conditions encountered during construction that could affect historic resource character-defining features or Historic District integrity. Any corrective actions shall be reviewed by the architectural historian and implemented in a manner consistent with the Secretary of the Interior's Standards.
- **Final Compliance Documentation.** Prior to issuance of a certificate of occupancy, the architectural historian shall prepare a final memorandum documenting implementation of the approved project and evaluating the completed construction for consistency with the approved plans and the Secretary of the Interior's Standards. The memorandum shall conclude whether the completed project maintains compatibility with the Santa Cruz Downtown Historic District and has not resulted in additional adverse effects on the District beyond those identified in this EIR. The City shall review and approve the memorandum prior to occupancy.

2.5.3 Less-Than-Significant Impacts

The Initial Study prepared for the Project, which is included in Appendix B, found the following impacts to be less than significant. Mitigation measures are not required. See also Section 4.0-3, Impacts Not Found to Be Significant,

Aesthetics

Visual Character. The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality.

Light and Glare. The Project would not create a new source of substantial light or glare.

Air Quality

Criteria Pollutant Emissions. The Project would not result in a cumulatively considerable net increase in any criteria pollutant.

Sensitive Receptor Exposure. The Project would not expose sensitive receptors to substantial pollutant concentrations.

Biological Resources

Wildlife Breeding-Nesting Birds. The Project would not result in impacts to nesting birds with implementation of the City's standard condition of approval that requires a pre-construction nesting survey and protection of nesting birds if any are found.

Conflicts with Local Policies or Regulations. The Project would not conflict with local heritage tree regulations.

Cultural Resources

Archaeological Resources and Human Burials. The Project would not cause a substantial adverse change in the significance of an archaeological resource or disturb human remains.

Energy

Energy Consumption. The Project would not result in wasteful or inefficient energy use during construction or operation or conflict with adopted plans.

Geology and Soils

Seismic Hazards. The proposed structure would be subject to seismic shaking from an earthquake on regional faults.

Erosion. The project would involve minimal grading and excavation that could result in erosion.

Expansive Soils. The Project would be sited on potentially expansive soils.

Paleontological Resources. Project construction could potentially destroy unknown paleontological resources.

Greenhouse Gas (GHG) Emissions

GHG Emissions. The Project would result in GHG emissions.

Hydrology and Water Quality

Water Quality. The project could result in water quality degradation due to stormwater runoff and potential erosion during construction, but would result in reduced impervious surfacing.

Stormwater Drainage. Project development would result in a slight reduction in impervious surfaces and would not alter the existing drainage pattern of the site or lead to erosion or increased runoff rates or contribute runoff that exceeds storm drain capacity.

Noise

Noise Increases. The Project would result in temporary increase in noise during construction and minimal permanent noise increases.

Population and Housing

Population. The Project would potentially result in a slight increase in population that would not exceed regional population estimates.

Public Services, Recreation and Utilities

Public Services. The Project would result in minimal, if any, increased demand for public services that would not require new or expanded facilities for fire and police protection, schools, parks or other public services.

Recreation. The Project would result in a potentially minor increase in residential population with an incremental increased demand for, and use of, public parks and recreational facilities.

Utilities. The Project would result in potentially minor increase in water demand, wastewater generation and solid waste generation.

Transportation

Vehicle Miles Traveled (VMT). The Project would not result in significant VMT impacts based on the City's adopted threshold and guidelines for review.

2.5.4 No Impacts

The Initial Study prepared for the Project, which is included in Appendix B, found no impacts for the following impact topics:

- Aesthetics: Scenic views, scenic resources
- Agriculture and Forestry Resources
- Air Quality: Conflict with or obstruct implementation of Air Quality Management Plan, odors
- Biological Resources: Special status species, sensitive habitat, wildlife movement, conflicts with adopted Habitat Conservation Plan or Natural Community Conservation Plan
- Energy: Conflict with plans for renewable energy or energy efficiency
- Geology and Soils: Fault rupture, non-seismic geologic hazards, septic systems
- GHG Emissions: Conflicts with adopted plans to reduce GHG emissions

- Hazards and Hazardous Materials: Use of or emissions of hazardous materials, location on hazardous materials site, location near airport, emergency response wildland fire hazards
- Hydrology and Water Quality: Groundwater impacts, flood and tsunami zones, conflicts with adopted water quality or groundwater management plans
- Mineral Resources
- Noise: Vibration, location near airport
- Population and Housing: Displacement of people or housing
- Recreation: New recreational facilities
- Transportation: Conflicts with circulation plan, policy or ordinance, hazards due to design, emergency access
- Tribal Cultural Resources
- Utilities. Relocation of utilities
- Wildfire: Emergency and evacuation plans, exacerbation of wildfire hazards, installation of infrastructure

2.6 Issues to Be Resolved

CEQA Guidelines section 15123 requires the Summary to identify “issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.” This EIR has presented mitigation measures and project alternatives, and the City will consider the Final EIR when considering the proposed project. In considering whether to approve the project, the City will take into consideration the environmental consequences of the project with mitigation measures and project alternatives, as well as other factors related to feasibility. “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines, section 15364). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or already owns the alternative site). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. The concept of feasibility also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, feasibility under CEQA encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

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3 Project Description

This section provides a detailed description of the proposed 307 Chestnut Street Residence (Project), as well as an overview of the Project location and setting, summary of area plans and designations applicable to the Project, intended uses of the EIR, and required Project approvals.

3.1 Project Location and Setting

The Project site is located in the City of Santa Cruz, which is located along the northern shore of Monterey Bay, approximately 75 miles south of San Francisco, 30 miles south of San Jose and 40 miles north of Monterey; see Figure 3-1. The 6,249-square-foot Project site (Assessor's Parcel Number [ANP] 006-502-11) is located on Chestnut Street, north of Maple Street, in the Downtown neighborhood of the City of Santa Cruz, as defined by the City's General Plan. The site is bordered by Chestnut Street on the east and residential uses on the north, south, and west. The Project site is located within a developed residential neighborhood that has a mix of single-family and small multi-family dwellings. Santa Cruz High School is located further west of the Project site. The site is currently developed with two single-family dwellings, tandem parking spaces and associated landscaping. The Project site is located within the boundaries of the Santa Cruz Downtown Historic District (Historic District), which was listed in the National Register of Historic Places (NRHP) in 1989 (NRHP# 89001005) and includes the oldest residential area in the city.

3.2 Project Objectives

Section 15124 of the State CEQA Guidelines indicates that the EIR Project Description shall include a statement of the objectives sought by the proposed Project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the Project. The objectives of the proposed Project provided by the City are as follows; those provided by the Applicant are identified as such:

1. Replace an existing dilapidated, unsafe, and energy inefficient home with a new home that meets current energy and building code requirements, with modern features and amenities.
2. Provide a simple two-story, rectangular structural design that is compatible with the Santa Cruz Downtown Historic District, consistent with the City's General Plan 2030 (HA1.9).
3. Upgrade condition of an existing housing unit.
4. Maximizing the density on site, consistent with the City's *General Plan 2030* (LU3.7.1).

3.3 Project Description

3.3.1 Project Uses and Site Plan

The Project proposes demolition of an existing single-family residential structure on a parcel containing two existing structures and construction of a new two-story single-family residential structure. The proposed new dwelling unit would contain a total of eight bedrooms and three bathrooms, which is similar to the existing structure that has six bedrooms and three bathrooms. The proposed dwelling unit would be a two-story structure with an approximate total floor area of 2,002 square feet, consisting of 1,010 square feet on the first floor and 992 square feet on the second floor, as well as an 81-square-foot covered porch. The new dwelling unit would be located generally within the footprint of the existing dwelling being demolished. The Project site plan is shown on Figure 3-2, and building elevations are shown on Figure 3-3.

An adjacent single-family residential structure that is located on the Project site would remain in place and would not be demolished, modified, or otherwise affected by the proposed development. This existing residence would continue to function independently from the proposed Project.

An existing deck located between the two buildings would be removed. Existing gas and electrical meters associated with the demolished structure would also be removed. A six-foot-tall existing fence surrounding the properties would remain, except for an existing three-foot-tall fence located along the front yard, which would be removed and replaced as part of the proposed improvements.

3.3.2 Proposed Improvements

Access and Parking. The Project would continue to be accessed from Chestnut Street using the existing driveway. No new vehicular driveways are proposed. The site plan identifies two tandem standard-sized parking spaces and two tandem compact parking spaces in the existing driveway adjacent to the proposed house.

Landscaping. The Project would provide approximately 410 square feet of private open space. The proposed Project includes the removal of two heritage trees. Replacement landscaping would include planting two 24-inch box Crepe Myrtle trees.

Utilities. The Project would be served by existing public water and sanitary sewer lines in Chestnut Street. A new onsite sanitary sewer line would tie into the existing lateral located in the side yard. A new onsite water and fire supply line also would be installed that connects to the existing water line on Chestnut Street. Electrical and gas service would be provided by Pacific Gas & Electric (PG&E), and electrical service would be provided through a new underground connection.

3.4 Area Plans and Zoning

3.4.1 City Plans and Zoning

The Project site currently is designated “Low-Medium Density Residential” (LM) in the City’s existing *General Plan 2030*. The property is zoned “R-L” (Multiple Residence-Low Density District). The proposed Project is consistent with

land use and zoning designations for the site. The Project site is not located in the coastal zone or within the boundaries of the City's *Downtown Plan*.

3.4.2 Other Regional Plans

Sustainable Communities Strategy

The Association of Monterey Bay Area Governments (AMBAG), as a metropolitan planning organization (MPO), is required by state and federal laws to develop and adopt a long-range transportation planning document known as a Metropolitan Transportation Plan (MTP). California's 2008 Senate Bill (SB) 375 requires each of the state's 18 metropolitan areas to develop a Sustainable Communities Strategy (SCS)—an integrated transportation, land use, and housing plan that addresses ways to accommodate future population growth and reduce greenhouse gas emissions from cars and light trucks. *Moving Forward Monterey Bay 2045* is the MTP/SCS for the three-county Monterey Bay Area.

The adopted MTP/SCS includes six goals and policy objectives set forth below. The proposed Project does not conflict with these goals and objectives and is consistent with environmental goals to promote environmental sustainability by improving housing conditions with more energy-efficient design and appliances.

- Access and Mobility – Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region.
- Economic Vitality – Raise the region's standard of living by enhancing the performance of the transportation system.
- Environment – Promote environmental sustainability and protect the natural environment.
- Healthy Communities – Protect the health of our residents; foster efficient development patterns that optimize travel, housing, and employment choices and encourage active transportation.
- Social Equity – Provide an equitable level of transportation services to all segments of the population.
- System Preservation and Safety – Preserve and ensure a sustainable and safe regional transportation system.

At the heart of SB 375 is the requirement to coordinate transportation investments with land use patterns such that the region makes informed decisions about where to invest the region's limited resources and simultaneously reduces greenhouse gases by providing more direct access to destinations as well as by providing alternative transportation options (AMBAG 2022). The Plan is required to analyze where people are going and how they want to get there in order to build a transportation network that addresses the mobility and accessibility needs of the region. One strategy included in the Plan to achieve this goal is more focused growth in high quality transit corridors. Another strategy is to provide more travel choices as well as a safe and efficient transportation system with improved access to jobs and education for the region's residents. The MTP/SCS identifies Opportunity Areas with the highest chance for successful sustainable growth in the future.

Opportunity Areas are generally located where Transit Priority Areas (TPAs) and Economic Development Areas within the AMBAG region overlap. An Opportunity Area is an area within 0.5 miles of an existing or planned "high-quality transit corridor" (as defined in California Public Resources Code section 21064.3) that has the potential for transit-oriented development, including mixed use. Opportunity Areas are places in the region with the highest chance for

successful sustainable growth in the future. This effort also identified TPAs as locations that have both supportive land use densities and high quality transit service/connections for each Opportunity Area. Opportunity Areas are used to identify a set of potential Transit Priority Projects that supports the SCS.

The proposed Project is not located within an identified Opportunity Area and would not conflict with goals set forth in the MTP/SCS.

Santa Cruz County Regional Transportation Plan

The Santa Cruz County Regional Transportation Commission's (SCCRTC) *2050 Santa Cruz County Regional Transportation Plan* (RTP), adopted in June 2026, provides guidance for transportation policy and projects through the year 2040. This Regional Transportation Plan (RTP) is a long-range planning document developed by the RTC in cooperation with Caltrans and other stakeholders. The purpose of the RTP is to establish regional goals, identify present and future needs, deficiencies, and constraints, analyze potential solutions, estimate available funding, and propose investments over a 20-plus year timeframe. Much effort on this 2050 RTP and the 2050 MTP has been focused on prioritizing projects that will reduce greenhouse gas emissions primarily from a reduction in vehicle miles traveled (VMT). One vehicle traveling one mile equals one "vehicle mile traveled." The stated goals of the RTP are:

- Reduce vehicle miles traveled (VMT) in order to establish livable communities that improve people's access to their regular needs.
- Ensure that plans, investments, policies, and transportation decisions will reduce disparities for historically and systemically marginalized, underserved, and excluded populations.
- Establish a climate-resilient transportation system that anticipates, adapts to, and mitigates the impacts of climate change.
- Deliver transportation improvements and maintenance cost effectively and responsive to the needs of all users of the transportation system.
- Eliminate transportation related fatalities and serious injuries for all transportation modes.

The Project is located in the Downtown area of the City of Santa Cruz. The 2050 RTP includes some intersection and mobility improvements in the Downtown area. There are no specific goals or proposed transportation improvements applicable to the proposed Project.

3.5 Intended Uses of EIR and Project Approvals

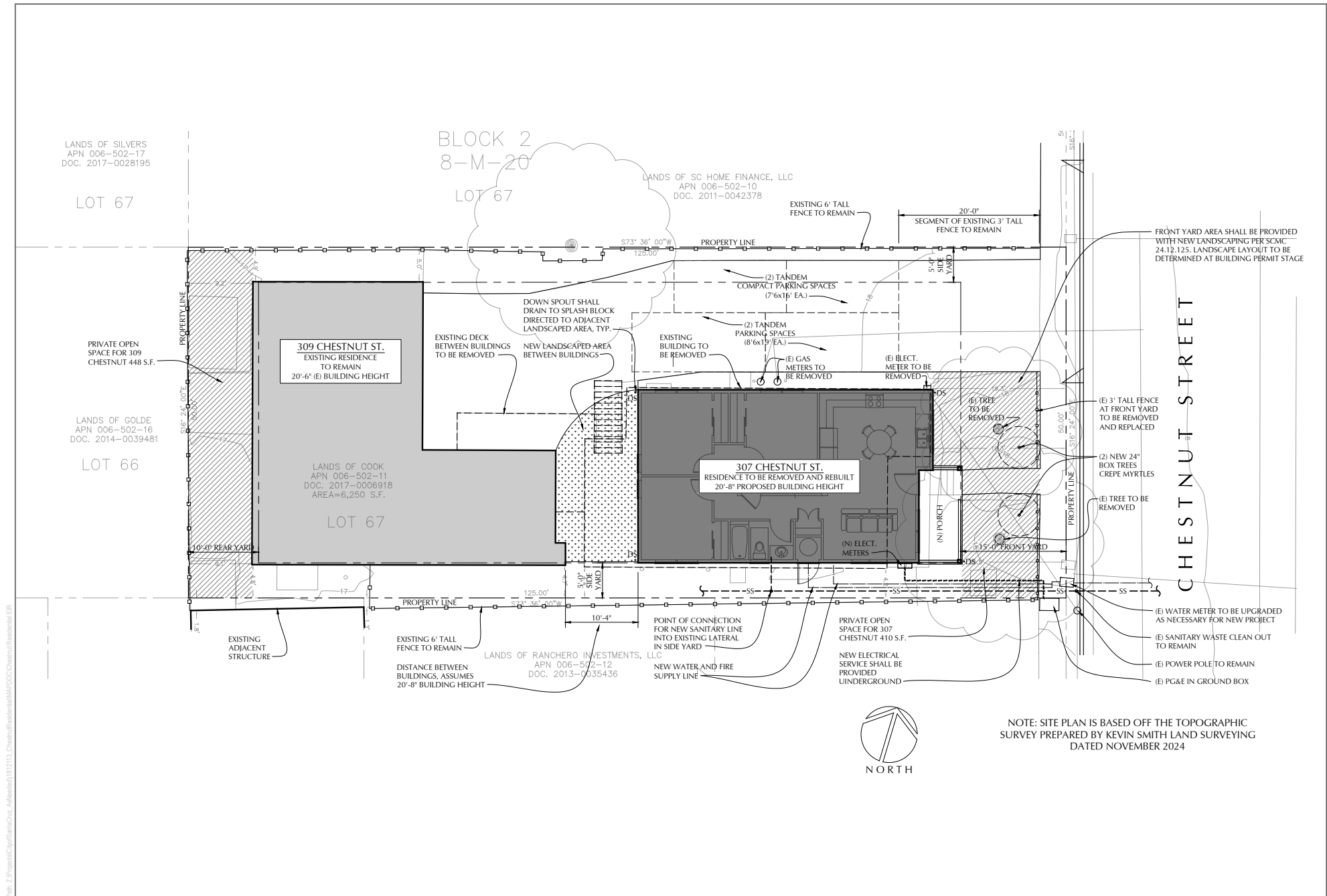
The City of Santa Cruz is the lead agency and responsible for approving the Project, and CEQA requires that decision makers review and consider the EIR in their consideration of the Project. As indicated in Chapter 1, Introduction, of this EIR, the EIR is an informational document for decision makers. The EIR includes a "project-level" analysis, meaning that no additional CEQA review should be required if the Project is approved and constructed without change. The City of Santa Cruz is the lead agency and responsible for approving the application requests and development permits for the Project. The following Project approvals are under consideration by the City: Residential Demolition Authorization Permit, Design Permit, and Heritage Tree Removal Permit. There are no other known agencies with review or permit approval authority over the Project.



SOURCE: Esri Aerial Imagery, OpenStreetMap, Santa Cruz County 2026

FIGURE 3-1
Project Location
 307 Chestnut Street Residence Project

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SOURCE: WCK Architects 2026

DUDEK

FIGURE 3-2
Project Site Plan
307 Chestnut Street Residence Project

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SOURCE: WCK Architects 2026

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FIGURE 3-3
Project Elevations

307 Chestnut Street Residence Project

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4.0 Environmental Analysis Introduction and Impacts Not Found To Be Significant

Chapter 4 provides a project-level analysis of the physical environmental effects of the proposed 307 Chestnut Street Residence Project.

4.1 Cultural-Historical Resources

This Introduction explains the organization of the EIR topical sections and how significant impacts are determined. This section also provides a summary of Impacts Not Found to Be Significant.

4.0-1 Section Organization

Each section in Chapter 4 describes the existing environmental setting, assesses impacts, and identifies mitigation measures for significant impacts.

4.0-1.1 Environmental Setting

The Environmental Setting sections provide a general overview of the existing conditions throughout the City, and describe the existing physical environment. Applicable federal, state, and local laws and regulations relevant to a discussion of impacts in the topic category also are identified, when relevant.

4.0-1.2 Environmental Impacts and Mitigation Measures

The Environmental Impacts and Mitigation Measures section identifies thresholds of significance used to evaluate whether an impact is considered significant, based on standards identified in or criteria derived from the California Environmental Quality Act (CEQA) and State CEQA Guidelines as amended at the end of 2018. In some cases, agency policies and regulations or professional judgment are used to further define CEQA standards of significance.

The Impacts section first identifies issues for which no impacts have been identified. The section then evaluates and analyzes significant or potentially significant project impacts, states the level of significance prior to mitigation. Pursuant to CEQA Guidelines Section 15161, the EIR examines all phases of the Proposed Project including construction and operation as relevant to the topic being addressed. Mitigation measures are provided for identified significant impacts. A statement regarding the level of significance of each impact after mitigation follows the mitigation measures for that impact. For impacts found to be less than significant, mitigation measures are not required.

4.0-2 Significance Determinations

In accordance with the California Environmental Quality Act (CEQA), specifically, Public Resources Code Section 21068, a “significant effect on the environment” means a substantial, or potentially substantial, adverse change in the environment. The significance thresholds used for each environmental resource topic are presented in each

section of Chapter 4 following the setting and before the discussion of impacts. For the impact analyses, one of the following significance determinations will be made:

- **No Impact (NI).** This determination is made if there is no potential that the Proposed Project could affect the resource at issue.
- **Less than Significant (LS).** This determination applies if there is a potential for some limited impact on a resource, but the impact is not significant in accordance with the significance criterion.
- **Less than Significant with Mitigation (LSM).** This determination applies if there is the potential for a substantial adverse effect in accordance with the significance criterion, but mitigation is available to reduce the impact to a less-than-significant level.
- **Significant Unavoidable (SU).** This determination applies to impacts that are significant, but for which there appears to be no feasible mitigation available to substantially reduce the impact.

4.0-3 Impacts Not Found to be Significant

The California Environmental Quality Act (CEQA) Guidelines Section 15128 requires that an environmental impact report (EIR) contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an initial study. An Initial Study was prepared for the Project, which is included in Appendix B, and impacts not found to be significant are summarized in Section 2, Summary.

A comment on the EIR Notice of Preparation (NOP) was received from the California Department of Toxic Substances Control (DTSC) regarding potential hazardous materials in existing building materials or imported fill. The following review provides additional review from what is included in the Initial Study based on this comment.

Hazardous Materials. The proposed Project includes demolition of one existing single-family home, which may contain asbestos and lead-based paint that could expose workers to a hazardous material release. Demolition of buildings containing asbestos also would be required to comply with the MBARD's Rule 306 that requires reporting and investigation of certain buildings with asbestos as established under federal law. Under federal law, a building must be inspected for asbestos prior to demolition or renovation, and federal and state agencies must be notified prior to demolition. According to the State Air Resources Control board, removal and disposal of asbestos procedures and controls must be specified in the notification form. The federal government banned consumer use of lead-based paint (LBP) in 1978 and many, but not all, asbestos-containing materials (ACMs) were banned in construction products in 1989.

The existing dwelling unit proposed for demolition was constructed in the late 1800s with other modifications to the structure made over time. Therefore, it has the potential to include LBP and ACMs. Project construction, including demolition, would be required to comply with applicable state regulations regarding LBP work practices, including testing and abatement. The removal of ACMs would be subject to the Asbestos Demolition and Renovation Program administered by the MBARD, which protects the public from uncontrolled emissions of asbestos through enforcement of the Federal Asbestos Standard. The Program includes survey and notification requirements prior to beginning a project, as well as work practice standards and disposal requirements. Additionally, The General Plan

2030 EIR found that all demolition activities would be required to be undertaken according to OSHA standards to protect workers from asbestos and lead based paint.

In addition, a standard City condition of approval is included in the project to require testing for asbestos and lead-based paint prior to demolition with approval from MBARD if hazardous materials are found and require removal. Therefore, with compliance with federal, state, and local regulations, the Project would not create a significant hazard to the public or environment involving the release of hazardous materials, resulting in a *less-than-significant impact*.

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4.1 Cultural Resources – Historical Resources

The following analysis identifies potential impacts to historical resources resulting from construction of the proposed 307 Chestnut Street Residence (Project). This section describes the existing conditions of historical resources on the Project site, discusses the regulatory setting, evaluates potential impacts to historical resources resulting from implementation of the Project, and, as applicable, identifies mitigation measures to reduce or avoid potentially significant impacts. This section is based on review of the 307 Chestnut Street, Santa Cruz – Standards Compliance Assessment (Standards Assessment) prepared by Architectural Resources Group (ARG) (ARG 2026) that is included in Appendix C and the 1989 National Register of Historic Places (NRHP) Santa Cruz Downtown Historic District (Historic District) nomination form (NRHP# 89001005) (Mathews et al. 1989) that is included in Appendix D.

No comments related to historical resources were received during the public scoping period in response to the Notice of Preparation (NOP). The NOP and comments received in response are provided in Appendix A.

4.1.1 Environmental Setting

The project site is located within the Historic District, which was listed in the NRHP in 1989 (NRHP# 89001005) and includes the oldest residential area in the city. The following subsections describe the environmental setting for the Proposed Project as it relates to historical resources, including the relevant historic context and Historic District, and current conditions at the Project site.

4.1.1.1 Historic Context

In accordance with best practices and National Park Service guidance, properties must be evaluated within their historic context to ensure a thorough application of the eligibility criteria in the determination of potential significance. Theme, place, and time are the basic elements that define a historic context. The historic context statement included in evaluations typically describes eras of physical development, including the evolution of building forms and architectural styles, as well as highlighting facets of patterns of development or events. Relevant sections of the historic context for the area including site-specific historic context are included and/or summarized below from the Standards Assessment by ARG that is provided in Appendix C and the Historic District nomination form, which is included in Appendix D.

The Santa Cruz Downtown Historic District

The Historic District was listed in the NRHP in 1989 and consists primarily of residential development constructed between 1860 and 1938 during the District's period of significance. The Historic District is significant under NRHP Criterion A in the area of exploration/settlement as the oldest residential neighborhood in Santa Cruz, and under NRHP Criterion C in the area of architecture as the city's largest concentration of intact historic residences. For this reason, the Historic District and its contributing resources are considered historical resources for the purposes of the CEQA. Relevant excerpts from the Historic District nomination form that describe the District's significance, historic context, architectural character, and boundaries are provided below:

Architectural styles in the Downtown Historic District reflect development over a 75-year period as the city's central residential area. Succeeding trends of architectural popularity are seen with both

ambitious and humble examples of styles that were used locally from the 1860s (when the area was settled) through the 1930s (when it was essentially built-out). These styles include Salt-box, Greek-Revival, Gothic-Revival, Italianate, Stick, Eastlake, Queen Anne, shingle-style, Colonial-Revival, and Craftsman. Probably the most noticeable nineteenth century style in Santa Cruz is Eastlake, found in very simple cottages and large elaborate houses, often in combination with Stick style. These many styles offer a variety of colors, decorative detail and design quality and generally superior workmanship as evidenced by their continued use and long life (Mathews et al. 1989: Section 7-1).

Architecture

The district contains an exceptional concentration of older homes that typify the City's social and architectural diversity over the period of its early growth, from the 1860s to the early twentieth century. All major architectural styles that were adopted locally during these years can be found in the area. Architect-designed homes and vernacular versions of various styles co-exist in this neighborhood.

The South of Laurel Area was sparsely built for many years, predominantly with farm houses. A change was noted in 1876. A new home at 322 Maple Street was described in the Santa Cruz Sentinel at the time, as a "handsome two-story residence hip-roof...a new departure from the many barn-like structures that are scattered promiscuously in the valley and on the hills."

This period, the mid 1870s, marks the transition from simple vernacular structures to more conscious efforts at style.

Although many buildings have been converted to multiple-family residential uses over the years, the general appearance of the area remains relatively unchanged. Single-family and multi-residential uses blend harmoniously. Most of the residences in the district were built between 1860 and 1910 and are constructed of redwood, a local building resource (Mathews et al. 1989: Section 8-1).

Exploration/Settlement

The Spanish era in Santa Cruz began with establishment of the first mission in 1791. In 1794, a more permanent building was constructed upon the bluff now known as Mission Hill. The mission floundered after devastating rains in 1824, leaving a vacuum that was soon to be filled by arrival of Anglo settlers.

As Americans moved into the area after 1840, the pace of life and the character of Santa Cruz began to change noticeably. New industries were begun, activity quickened, and there was regular movement of people and goods in and out of town. By the time of the American takeover in 1846, there was a sawmill, tannery, limekiln, and foundry. Lumbering served the dual purpose of clearing land for agriculture and development, and spurring the construction of a wharf in 1851. The shipping of lumber in turn promoted the development of the port in general.

In 1848, Elihu Anthony bought the land south of Water Street between Front Street and the San Lorenzo River. He built the first business in that part of town at North Pacific, Water, and Mission streets, and he sold the rest of the lots. Within a couple of years, many businesses were established on Front Street and it soon became the principal business street in town.

As commerce moved to the flatlands in the American era, so did residential growth. Fred Hihn owned much of the old Mission garden between Mission Hill and Beach Hill. (The area comprising the Downtown Historic District.) He laid out and developed much of the land north of Lincoln Street during the prosperous gold rush years of the 1850s. Land was also being subdivided for residences on Mission Hill and west of the Mission on the coast road to San Francisco, but the principal area of growth was below the hill. Santa Cruz bustled and prospered during the early years of the gold rush, principally selling mining tools, potatoes, hides and tallow. When the potato market collapsed, the boom ended, but it had lasted long enough to irrevocably alter the character of the town and to finally firmly establish it after 60 uncertain years (Mathews et al. 1989: Section 8-2).

In 1860, the town set up a common water system, facilitating further growth. In the following decade the population nearly tripled. More houses were built above Lincoln Street, and the rest of the old Mission garden below Lincoln was laid out for an initial wave of development. The port continued to grow as Santa Cruz County became one of the two major suppliers of wood to San Francisco. In 1864 a powder works was established north of the City, where it became the major industry for 50 years. The major industry of a later period also got its start from the mid-1860s development of the first tourist hotels, summer cottages, the Leibrandt Bath House and other facilities by the beach.

The population grew by another fifty percent in the 1870s. Business continued to shift to Pacific Street which experienced a building boom after 1875. The most important development of the 70s, however, was the coming of the railroad which finally ended Santa Cruz's long-time dependence on shipping. A spur from the mainline reached Santa Cruz from Watsonville and Gilroy in the 1870s, and a short line ran up to Felton about that time. The most important result of the coming of the railroad, however, was the increased accessibility of Santa Cruz to tourists. Thus, as the port declined in importance, tourism began to rise. The railroad was an essential aspect of tourism, both as a means of transportation and as the most important promoter of the City. In 1884, the Neptune Baths and the first roller coaster in town were built on the beach, and in 1887 the Sea Beach Hotel was expanded and came into prominence as the major hotel in Santa Cruz.

The next two decades, particularly the 1890s, were marked by little growth in Santa Cruz. Within the boundaries of the downtown Historic District, infill took place, bringing the area to virtual build-out by about 1938. This state of development is essentially intact. Thus, reflecting that Santa Cruz is the oldest city in the county, residential development in the Downtown Historic District represents the earliest remaining architectural resources in the northern Monterey Bay area (Mathews et al. 1989: Section 8-13).

The [district] is generally bounded on the north by Church and Rincon Streets, on the south by Laurel and Maple Streets, on the east by Cedar Street, and on the west by Chestnut and Myrtle Streets. The boundaries for the proposed district were selected to include the maximum number of contributing buildings while having a relatively even perimeter. There are 173 contributing

structures within the boundary, 32 non-contributing buildings and 4 vacant parcels (Mathews et al. 1989: Section 10-1).

Character-Defining Features of the Santa Cruz Downtown Historic District

Character-defining features (CDF) enable a historical resource to convey its historic identity. Generally, CDFs can be defined as materials, forms, location, spatial configurations, or uses that contribute to a historic resource's historic significance. CDFs often relate to a particular architectural typology, style, or period of construction. ARG notes in its assessment that the Historic District nomination form does not explicitly identify CDFs for the District; therefore, ARG compiled the following list of common characteristics as part of their analysis following a November 2025 survey of the Historic District (ARG 2026: 3):

- Range of late nineteenth to early twentieth century residential styles: Greek Revival, Gothic Revival, Italianate, Stick, Eastlake, Queen Anne, Shingle, Folk Victorian, Vernacular, and Colonial Revival, and Craftsman.
- Height: 1-2.5 stories in height.
- Roof forms and elaborations: gable, hipped, combination, and flat roof forms; dormers and towers also present in some examples.
- Porches: full- and partial-width porches with turned, square, round or pyramidal porch posts.
- Materials: horizontal wood siding (drop, shiplap, lap); wood shingles (fish-scale, coursed, staggered, diamond); limited stucco cladding; brick chimneys.
- Details and ornamentation: elaborate millwork (doors, cornices, window and door surrounds), decorative gable ends and porch ornament (brackets, spindle work, pediments); wood window and door trim.
- Windows: wood double-hung windows, sometimes paired; multi-pane configurations (e.g., 2-over-2, 6-over-1); casements; leaded glass.
- Symmetrical and asymmetrical designs.
- Generally consistent setbacks from the street, uniform scale, mature shade trees.

4.1.1.2 Project Site Conditions

The Project site is located at 307 Chestnut Street. The site includes two existing dwelling units. The front unit, addressed as 307 Chestnut Street was constructed between 1892 and 1905. The second unit is located in the rear, addressed as 309 Chestnut Street, and was heavily modified and/or completed in the early 1980s (ARG 2026: 4–5).

Sanborn Fire Insurance maps indicate that initial development of the property occurred between 1892 and 1905, with subsequent additions and modifications occurring throughout the twentieth century. By 1928, the property contained the front residence, associated outbuildings, and additional residential improvements. Significant alterations occurred during the early 1980s, including additions and rehabilitation work to 309 Chestnut Street, followed by later modifications to siding, windows, doors, and other exterior features (ARG 2026: 5). Despite this, the nomination form specifically notes that the building retained evidence of an earlier nineteenth-century core (Mathews et al. 1989: Section 7-15).

Although the property had undergone several substantial alterations by 1989, 307 Chestnut Street was identified as a contributing resource (building) to the Historic District (see Building #89, then addressed as 311 Chestnut Street). Because the NRHP nomination was completed after most of the documented alterations, the contributor designation suggests that those changes were reviewed and did not prevent the building from contributing to the Historic District's significance. For these reasons, the Project site is therefore considered a historical resource for the purposes of CEQA.

Character-Defining Features of 307 Chestnut Street

The Historic District nomination form identifies the character-defining features associated with 307 Chestnut Street in 1989 when it was listed.:

Building #89: 311 Chestnut St. Vernacular story-and-a-half with wide front gable and one-story section to north, has been chaotically remodeled over one year. Most windows are 2 over 2, indicating the core would date from ca. 1870. Some 3-in-1 siding on front porch addition (ca. 1900-1915), but most of the house covered with asbestos shingles (Mathews et al. 1989: Section 7-15).

ARG compiled an enhanced physical description of the property following a survey in November 2025:

The subject parcel contains 307 Chestnut Street near the front lot line, and 309 Chestnut Street near the rear lot line. A one-story garage attaches to the north wall of 309 Chestnut Street, near the northwest corner of the lot [...] 307 Chestnut Street is a one-and-a-half story residence with a front-facing gable roof covered in asphalt shingles. Rectangular in plan, the walls are clad in a mix of asbestos shingles, horizontal wood lap siding, false beveled wood siding, and wood T-1-11 siding. A shed roof porch projects from the front of the building, and a wood stairway leading to a second story deck connects 307 Chestnut Street to 309 Chestnut Street at the rear of the building. Some original or early six-light wood windows remain on the north façade, but most windows have been replaced with modern vinyl or aluminum sash windows. Window and door openings are framed with plain wood trim, and a replacement door provides access at the primary (east) entrance.

The residence at 307 Chestnut also has a rectangular plan and a front-facing gable roof clad in asphalt shingles. Two smaller gables extend from the roof plane to the north and south of the main gable, near the front of the building. A mix of wood shingles and wood drop lap siding clads the exterior walls, and all windows appear to be vinyl or metal sash with plain wood trim. The attached two-car garage has a side gable roof clad in roll roofing, paired wood garage doors, wood drop lap siding, and a wood pedestrian entry door (ARG 2026: 4-5).

Project Site Historical Resources Summary

The Project site contains 307 Chestnut Street, a contributing building to the NRHP-listed Santa Cruz Downtown Historic District. Because NRHP-listed resources are automatically listed in the California Register of Historical Resources (CRHR), both the individual contributing building and the Historic District are historical resources for the purposes of CEQA.

4.1.2 Regulatory Framework

4.1.2.1 Federal

National Historic Preservation Act (54 USC § 300101 et seq., including Section 106 of the NHPA, 54 USC § 306108)

The National Historic Preservation Act (NHPA) established the NRHP and the Advisory Council on Historic Preservation (ACHP). Under the NHPA, significant cultural resources are referred to as historic properties, which include any prehistoric or historic district, site, building, structure, or object included in, or determined eligible for inclusion in the NRHP. Historic properties that are designated by the Secretary of the Interior to be National Historic Landmarks are nationally significant historic places that possess exceptional value or quality in illustrating or interpreting the heritage of the United States. A property is considered historically significant if it meets one of the NRHP criteria and retains sufficient historic integrity to convey its significance.

The NRHP criteria for evaluation (36 CFR section 60.4) considers the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

- A. are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. are associated with the lives of persons significant in our past; or
- C. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. have yielded or may be likely to yield, information important in prehistory or history.

To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity. Integrity is the ability of a property to convey its significance. Because the concept of integrity is based on significance, the assessment of a property's integrity can only proceed after its significance has been fully established. In addition to meeting at least one of the significance criteria discussed above, the assessment of integrity requires consideration under the following seven aspects or qualities: location, design, materials, workmanship, setting, feeling, and association. To retain integrity, a property will always possess several, and generally most, of these aspects (NPS 1997: 44).

Certain properties are not typically considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past 50 years. These properties may be eligible for listing in the NRHP if the property meets one of the four criteria listed above and if the property also meets the appropriate Criteria Consideration for the property.

National Environmental Policy Act, as amended (42 USC § 4321 et seq.)

The National Environmental Policy Act (NEPA), as amended, establishes the federal government's policy for protecting important historic, cultural, and natural aspects of our national heritage during the planning for federal projects. All federal or federally assisted projects requiring action pursuant to section 102 of NEPA must take into

account the effects of those projects on cultural resources. In considering whether an action may “significantly affect the quality of the human environment,” NEPA requires federal agencies to consider the degree to which their actions may affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP.¹ While NEPA and NHPA have independent statutory obligations, integrating their processes can streamline environmental reviews and ensure that cultural resources are adequately considered during federal project planning. When section 106 of the NHPA and NEPA are integrated, project impacts that cause adverse effects under section 106 are described in the NEPA document.

4.1.2.2 State

California Register of Historic Resources (PRC § 5024.1 and 14 CCR § 4850)

Public Resources Code (PRC) section 5024.1 establishes the CRHR, which lists all significant resources in California that are considered to be historical resources. In California, the term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (PRC section 5020.1[j]). In 1992, the California legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC 5024.1[a]). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP. As such, a resource is considered historically significant if it meets at least one of the following criteria outlined under PRC section 5024.1(c):

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the significance criteria described in PRC section 5024.1(c), a resource must also possess sufficient integrity to qualify for listing in the CRHR. Integrity as defined in 14 California Code of Regulations (CCR) section 4852(c) as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” as evaluated with regard to the resource’s retention of location, design, setting, materials, workmanship, feeling, and association. Properties that are listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. Historical resources that lack sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR if they have the potential to yield significant scientific, historical

¹ For projects implemented prior to April 11, 2025, the CEQ advises that federal agencies “should consider voluntarily relying on its rescinded regulations at 40 CFR parts 1500-1508 to complete ongoing NEPA reviews or to defend against challenges to reviews completed while those regulations were in effect.” For projects that are approved and implemented after April 11, 2025, the CEQ advises that “federal agencies must revise or establish their NEPA implementing procedures (or establish such procedures if they do not yet have any) to expedite permitting approvals and for consistency with NEPA as amended by the Fiscal Responsibility Act of 2023, including the deadlines established in NEPA” (Council on Environmental Quality, “Memorandum for Heads of Federal Departments and Agencies.” February 19, 2025, 1-2).

information, specific data. Therefore, the CRHR includes properties designated under local ordinances or identified through local historical resource surveys. A resource less than 50 years old may also be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]). The CRHR has three special considerations for resources described under 14 CCR section 4852(d) for certain property types. These are limited to moved buildings, structures or objects; historical resources achieving significance within the past 50 years; and reconstructed buildings.

California Environmental Quality Act

The following California Environmental Quality Act (CEQA) statutes (in PRC Division 13, Environmental Quality) and State CEQA Guidelines (in California Code of Regulations Title 14, Division 6, Chapter 3) are of relevance to the analysis of historical resources. PRC section 21084.1 and CEQA Guidelines section 15064.5(a) define “historical resources” as:

- A resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR);
- A resource listed in a local register of historical resources.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California... Generally, a resource is considered historically significant if it meets criteria for listing in the California Register of Historical Resources, including:
 - Is associated with events that made a significant contribution to the broad patterns of California's history and cultural heritage.
 - Is associated with the lives of people important in our past.
 - Embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values.
 - Has yielded or may be likely to yield information important in prehistory or history; OR
 - A resource determined to be a historical resource by a project's lead agency.

In addition, CEQA Guidelines section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource.” It also defines the circumstances when a project would materially impair the significance of a historical resource. More specifically, under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (PRC section 21084.1; CEQA Guidelines section 15064.5[b]). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of PRC section 5024.1[q]), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (PRC section 21084.1; CEQA Guidelines section 15064.5[a]). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC section 21084.1; CEQA Guidelines section 15064.5[a]).

A “substantial adverse change in the significance of an historical resource” reflecting a significant effect under CEQA means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines

section 15064.5(b)(1); PRC section 5020.1[q]). In turn, CEQA Guidelines section 15064.5(b)(2) states the significance of an historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance is materially impaired.

PRC sections 21083.2(b)-(c) and CEQA Guidelines section 15126.4 provide information regarding the mitigation framework for historic resources.

4.1.2.3 Local

Santa Cruz City Historic Building Survey

Cultural landmarks in the City are termed Historic Landmarks and are under the aegis of the Community Development Department of the City of Santa Cruz. The City maintains a list of Historic Landmarks, as well as other built historic resources, in the Historic Building Survey. Historic Landmark is defined in Part 5: Historic Preservation within the Community Design Chapter, as “an individual structure or other feature, or group of structures on a single lot or site, or a site having special aesthetic, cultural, architectural, or engineering interest or value of an historical nature as a ‘landmark’” (Municipal Code section 24.12.420, amended by Ordinance No. 2003-14, effective April 22, 2003).

To become a Historic Landmark, or to be placed on the Historic Building Survey, a property must first be evaluated for local historic significance based on the following criteria (Municipal Code section 24.12.440, amended by Ordinance No. 2003-14, effective April 22, 2003):

- c. The property is either a building, site, or object that is:
 1. Recognized as a significant example of the cultural, natural, archaeological, or built heritage of the city, state, or nation
 2. Associated with a significant local, state, or national event
 3. Associated with a person or persons who significantly contributed to the development of the city, state, or nation

4. Associated with an architect, designer, or builder whose work has influenced the development of the city, state, or nation
5. Recognized as possessing special aesthetic merit or value as a building with quality of architecture and that retains sufficient features showing its architectural significance
6. Recognized as possessing distinctive stylistic characteristics or workmanship significant for the study of a period, method of construction, or use of native materials
7. Retains sufficient integrity to accurately convey its significance

The City recognizes two historic districts and several potential historic districts. A City Historic District is evaluated and defined by the following criteria (Municipal Code section 24.06.120, amended by Ordinance No. 85-05, effective 1985):

The district is:

8. Recognized as a geographically definable area possessing a significant concentration of buildings that are well designed and other structures, sites, and objects which are united by past events or by a plan or physical development
9. Recognized as an established and geographically definable neighborhood united by culture, architectural styles or physical development

4.1.3 Impacts and Mitigation Measures

4.1.3.1 Thresholds of Significance

In accordance with CEQA; State CEQA Guidelines (including Appendix G); City of Santa Cruz plans, policies, and/or guidelines; and agency and professional standards; a project impact would be considered significant if the project would:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5 of the State CEQA Guidelines.

4.1.3.2 Methodology

The methodology for the historical resources analysis was based on review of the materials identified at the beginning of this section, including the NRHP nomination form, the Standards Assessment, and supporting structural and construction documentation. Dudek used these materials to identify historical resources on the Project site and evaluate potential impacts under CEQA.

Significant impacts to historical resources may result from demolition or physical alteration of structures, or alteration of the setting of a historical resource by the introduction of incompatible elements, in cases where the property retains integrity of setting and the setting of the resource contributes to its significance.

According to the materials reviewed, the Project site contains the structure at 307 Chestnut Street, a contributing building to the NRHP-listed Santa Cruz Downtown Historic District. Therefore, both the individual contributing building and the Historic District constitute historical resources for the purposes of CEQA.

4.1.3.3 Project Impacts and Mitigation Measures

As described in Section 4.1.1, Environmental Setting, the Project site contains two historical resources for the purposes of CEQA: (1) 307 Chestnut Street, a contributing building to the NRHP-listed Historic District, and (2) the Historic District itself. Accordingly, the analysis below considers the Project's effects on both the contributing building and the District as a whole. The proposed replacement residence was evaluated by ARG for compatibility with the District and found consistent with Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation.

307 Chestnut Street

Impact CUL-1 The Project would cause a substantial adverse change in the significance of a historical resource at 307 Chestnut Street that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in CEQA Guidelines section 15064.5. (*Significant*)

The proposed Project would demolish the existing 307 Chestnut Street residence, a contributor to the NRHP-listed Historic District, and replace it with a new two-story single-family residence. The proposed new residential unit would contain a total of eight bedrooms and three bathrooms, which is similar to the existing structure that has six bedrooms and three bathrooms. The new residence would be two stories tall and would include approximately 2,002 square feet of floor area, plus an 81-square-foot covered porch. The replacement residence would be built generally within the footprint of the existing residence proposed for demolition. The project site plan and building elevations are shown on Figures 3-2 and 3-3, respectively, in Section 3, Project Description, of this EIR.

An adjacent single-family residential building (309 Chestnut Street) that is located on the Project site would remain in place and would not be demolished, modified, or otherwise affected by the proposed development. This existing residence would continue to function independently from the Project. An existing deck located between the two buildings would be removed. Existing gas and electrical meters associated with the demolished structure would also be removed. A 6-foot-tall existing fence surrounding the buildings would remain, except for an existing 3-foot-tall fence located along the front yard, which would be removed and replaced as part of the proposed improvements.

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment." Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired." The significance of an historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance" and that justify or account for its inclusion in, or eligibility for inclusion in, the CRHR. Therefore, demolition of 307 Chestnut Street would permanently remove a contributing resource and materially impair the significance of the contributing building to the Historic District. The building would no longer exist and would have no integrity to convey its significance as a contributor to the Historic District. Thus, demolition of the building in order to construct the Project would result in a substantial adverse change in the significance of a CEQA historical resource and would cause a *potentially significant impact*.

Mitigation Measures

Implementation of Mitigation Measure CUL-1 would document the historical resource at 307 Chestnut Street and preserve information about the resource. However, demolition of the contributing building would still result in a

substantial adverse change to a historical resource, and thus MM-CUL-1 would not reduce the direct impact to the building at 307 Chestnut Street to a less-than-significant level. Therefore, the impact to the 307 Chestnut Street building would remain *significant and unavoidable* as the Project would demolish the building's character-defining features, which defines the building as a historical resource and it will no longer convey its significance. Alternatives to rehabilitate and/or protect the existing 307 Chestnut Street structure are discussed in Section 5.5, Project Alternatives, of this EIR.

CUL-1 HABS-like Documentation. The City shall ensure the preparation of HABS-like Level II documentation for both 307 Chestnut Street and the Santa Cruz Downtown Historic District prior to the issuance of any Project related permitting or construction. The HABS-like documentation shall be completed and submitted to the identified repositories within nine months of the environmental document being certified and prior to the issuance of any Project related permitting or construction. All work shall be prepared by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards for architectural history and/or history (36 Code of Federal Regulations, Part 61). The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for a HABS Short Format for a Level II as shown in *HABS History Guidelines Updated October 2023*. This mitigation measure is being proposed in compliance with CEQA and does not necessitate consultation or approval of the documentation by NPS or the State Historic Preservation Officer. Archival CD/DVD containing a PDF of the written documentation and the photographs (prepared and indexed as outlined below) shall be produced according to the NPS standards identified in *HABS History Guidelines Updated October 2023*. The documentation and photographs shall be distributed to the City of Santa Cruz Community Development Department, the Santa Cruz Museum of Art & History, the Local History Room of the Santa Cruz Public Library, and the Northwest Information Center of the California Historical Resources Information System. The HABS-like Level II short format documentation shall be limited to the following:

- **HABS-like Level II Short Form Report:** A written narrative historical report, per *HABS History Guidelines Updated October 2023* shall include historical information, including the physical history and historic context of 307 Chestnut Street and the Santa Cruz Downtown Historic District, and an architectural description of the setting and exterior of the building of 307 Chestnut, the District, and each contributing resource to the District. The report shall be prepared by a qualified professional who meets the standards for history or architectural history set forth by the Secretary of the Interior's Professional Qualification Standards. Archival copies of the drawings, photographs, and report shall be submitted to the Community Development Department, and to repositories including but not limited to the Santa Cruz Museum of Art & History, the Local History Room of the Santa Cruz Public Library, the Northwest Information Center, and California Historical Society. This mitigation measure would create a collection of reference materials that would be available to the public and inform future research.

The written documentation shall be printed on archival paper according to NPS standards for HABS documentation. Archival CD/DVD containing a PDF of the written documentation and photographs shall be produced according to NPS standards.

- **Photographs:** Digital photographs shall be completed prior to issuance of any Project related permitting or construction. Photograph documentation shall be prepared according to the NPS *National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy 2024*. The photographer shall be familiar with the NPS photograph policy and work with a qualified architectural historian or historian. A minimum of 10 photographs must

be taken of 307 Chestnut Street which shall include the overall parcel, all elevations of the building, existing setting, surrounding viewsheds, and character-defining details. No interior spaces (communal or private living spaces) are required. A minimum of two overview photographs of the District's main thoroughfares shall be taken. The views will be directed by the architectural historian or historian working with the photographer. A minimum of two photographs of each contributing resource to the District must be taken, which will include one oblique and one straight-on view of the main façade of the resources. *No interior spaces (communal or private living spaces) are required for the District and its contributors. Photographs shall be indexed according to NPS National Register of Historic Places and National Historic Landmarks Program Consolidated and Update Photograph Policy 2024.*

Santa Cruz Downtown Historic District

Impact CUL-2 The Project would potentially cause a substantial adverse change in the significance of the Santa Cruz Downtown Historic District that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in CEQA Guidelines section 15064.5. *(Significant)*

The Santa Cruz Downtown Historic District is a NRHP-listed district making it a historical resource. According to the State CEQA Guidelines section 15064.5(b)(3), generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (National Park Service 2017), shall be considered as mitigated to a level of less than a significant impact on the historical resource. With designs that meet the Secretary of Interior's Standards, any impacts would be considered less than significant. In the present case, the existing structure at 307 Chestnut Street would be completely demolished and would not be restored or rehabilitated. However, the other building located on the Project site would be retained.

Although demolition of the existing contributing building, 307 Chestnut Street, would remove a resource that contributes to the significance of the Historic District, a potentially significant impact, the proposed replacement residence will be designed to be compatible with the District's historic character. Based on its scale, massing, siting, and architectural treatment, the replacement construction would not substantially diminish the District's significance or materially impair the integrity of location, design, setting, feeling, or association through which the District conveys its significance. Consistent with this conclusion, ARG determined that the proposed design conforms to Standards 9 and 10 of the Secretary of the Interior's Standards for Rehabilitation and is compatible with the Historic District while remaining distinguishable as a contemporary building which does "not attempt to replicate a specific historic style" (ARG 2026: 10–11).

The Historic District's character-defining features, which are described above, would remain intact. The District's overall integrity of location, design, materials, workmanship, setting, feeling and association would not be impaired by the loss of one contributing building. The Historic District will continue to convey its significance under NRHP Criteria A and C. Additionally, the Historic District would retain 172 of its 173 contributing resources. ARG notes, however, that the design has not been finalized and provided recommendations on materials selection for windows and doors.

Mitigation Measures

Implementation of Mitigation Measure CUL-2 requires the preparation of a Historic Monitoring Plan ensuring the final design meets the Secretary of the Interior's Standards, and a memorandum confirming that the completed project maintains compatibility with the Santa Cruz Downtown Historic District and has not resulted in additional adverse effects on the District beyond those identified herein. While the measure would not avoid demolition of the contributing building, implementation of MM-CUL-2 would minimize impacts to the Santa Cruz Downtown Historic District because the replacement construction would meet Standards 9 and 10 of the Secretary of the Interior's Standards while the District would continue to convey its significance after reconstruction of a new structure at 307 Chestnut Street. Therefore, the impact to the Historic District would be reduced to a *less-than-significant* level with mitigation.

CUL-2 Historic Monitoring Plan. Prior to issuance of grading, demolition, or building permits, the applicant shall retain a qualified architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for architectural history and/or history (36 Code of Federal Regulations, Part 61). The architectural historian shall prepare a Historic Monitoring Plan (HMP) for review and approval by the City. The HMP shall be implemented as specified below and shall include, at a minimum:

- **Design Review and Conformance Evaluation.** Prior to permit issuance, the architectural historian shall review the final construction drawings and associated project plans to confirm that the final design remains consistent with the character-defining features of the Santa Cruz Downtown Historic District and conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties, including Standards 9 and 10 governing new construction within historic districts.
- **Historic Resource Protection Measures.** The HMP shall identify measures to prevent inadvertent damage to nearby historic resources and Historic District features during demolition and construction activities and shall establish protocols for communication with the City should unanticipated historic-resource issues arise.
- **Construction-Phase Monitoring and Consultation.** The architectural historian shall remain available throughout demolition and construction activities to review any project modifications, unforeseen conditions, or design changes that may affect the Historic District and provide recommendations to ensure continued conformance with the Secretary of the Interior's Standards.
- **Treatment of Unanticipated Conditions.** The HMP shall establish procedures for the review and resolution of unanticipated conditions encountered during construction that could affect historic resource character-defining features or Historic District integrity. Any corrective actions shall be reviewed by the architectural historian and implemented in a manner consistent with the Secretary of the Interior's Standards.
- **Final Compliance Documentation.** Prior to issuance of a certificate of occupancy, the architectural historian shall prepare a final memorandum documenting implementation of the approved project and evaluating the completed construction for consistency with the approved plans and the Secretary of the Interior's Standards. The memorandum shall conclude whether the completed project maintains compatibility with the Santa Cruz Downtown Historic District and has not resulted in additional adverse effects on the District beyond those identified in this EIR. The City shall review and approve the memorandum prior to occupancy.

5 CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR consider all aspects of a project when evaluating its impact on the environment, including planning, acquisition, development, and operation. This section also indicates that the EIR must discuss (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, and (4) growth-inducing impacts of the proposed project. Chapter 2, Summary, and Sections 4.0 and 4.1 of this EIR provide a comprehensive identification and evaluation of the proposed project's environmental effects, mitigation measures, and the level of impact significance both before and after mitigation. This section addresses the other required topics identified above, as well as cumulative impacts and project alternatives as a result of construction of the proposed 307 Chestnut Street Residence (Project).

5.1 Significant Unavoidable Impacts

The State CEQA Guidelines require a description of any significant impacts, including those that can be mitigated but not reduced to a level of insignificance (section 15126.2(b)). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR identified the following significant unavoidable project impacts:

- The Project would cause a substantial adverse change in the significance of a historical resource due to demolition of the structure at 307 Chestnut Street, which is a contributing building to the National Register of Historic Places-listed Santa Cruz Downtown Historic District (Historic District).

As discussed in Section 5.5, Project Alternatives, alternatives to relocate the structure or the Project or construct a replica building were considered but determined to be infeasible. Other alternatives to fully or partially rehabilitate the Project were carried forward for full discussion that would reduce the cultural resources impact, but not to a less than significant level.

5.2 Significant Irreversible Impacts

The State CEQA Guidelines section 15126.2(d) requires a discussion of significant irreversible environmental changes that would result from a project including uses of nonrenewable resources during the initial and continued phases of a project. The Guidelines indicate that use of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Irreversible damage can also result from environmental accidents associated with a project.

The proposed Project consists of demolition of an older single-family house constructed in the late 1800s and reconstruction of one new single-family house. As discussed in the Initial Study, which is included in Appendix A of this EIR, the new residence would be subject to requirements of California Building Code and City Green Building

Code requirements, as well as compliance with City requirements for water conservation fixtures and features, including drought-resistant landscaping. The new building, thus, would incorporate more energy efficient designs than in the existing older building proposed for demolition. The Project applicant proposes to construct the Project with all electric utility systems. Overall, future consumption of electrical resources would not represent unnecessary, inefficient, or wasteful use of resources, and construction of the Project also would not result in inefficient use of energy resources. Neither Project construction nor use once constructed would result in a substantial use of non-renewable energy resources.

Section 15227 further requires this discussion only for adoption of a plan, policy or ordinance by a public agency; the adoption by a Local Agency Formation Commission (LAFCO) of a resolution making determinations; and projects which require preparation of an EIS under the National Environmental Policy Act (NEPA). The Project does not meet these requirements as reconstruction of a single-family dwelling unit, and no further review is required.

5.3 Growth Inducement

CEQA requires that any growth-inducing aspect of a project be discussed in an EIR. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. Projects which could remove obstacles to population growth (such as major public service expansion) must also be considered in this discussion. According to CEQA, it must not be assumed that growth in any area is necessarily beneficial, detrimental or of little significance to the environment.

As of January 1, 2026, the City had a population of 63,065 people, and an estimated 25,066 housing units (California Department of Finance 2026). The proposed Project consists of replacement of an existing single-family residence with a unit of similar size and would not result in a net increase in residential dwelling units. There are two additional bedrooms than currently exist that may slightly increase average household size. Even if it is assumed that the average household size is increased by two to three people based on the proposed bedroom count, the addition of three people to the existing population would result in a City population of approximately 63,068.

The Association of Monterey Bay Area Governments (AMBAG) develops population and housing forecasts for the region. The current forecast for the City of Santa Cruz in 2030, the year closest to expected completion of the Project, is 68,057 people (AMBAG 2026). With the additional population potentially resulting from the proposed Project, the total population of the City of Santa Cruz would be well below this forecast. Therefore, while the Project would result in a potential minor increase in population, this population growth due to the Project would not be substantial or considered growth-inducing as it would be within regional population forecasts for the City.

The Project does not include installation of off-site utility improvements or extension of water or sewer into undeveloped areas. The Project does not include commercial or other non-residential uses that could foster economic growth. Therefore, the Project site would not remove obstacles to development and population growth. Therefore, the Project would not indirectly foster population or economic growth.

5.4 Cumulative Impacts

5.4.1 State CEQA Requirements

The State CEQA Guidelines section 15130(a) requires that an EIR discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” As defined in Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. As defined in section 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider the effect significant.

CEQA further requires an evaluation of cumulative impacts when they are significant. When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Furthermore, according to the California State CEQA Guidelines section 15130 (a)(1), there is no need to evaluate cumulative impacts to which the project does not contribute.

An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant when, for example, a project funds its fair share of a mitigation measure designed to alleviate the cumulative impact. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide detail as great as that provided for the impacts that are attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified project contributes.

Discussion of cumulative impacts may consider either a list of past, present, and probable future projects producing cumulative impacts; or a summary of growth projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts, such as those contained in a General Plan. If a lead agency determines that a cumulative effect has been adequately addressed in a prior EIR for a community plan, general plan or zoning action, and the project is consistent with that plan or action, that cumulative effect is not required to be examined in a later EIR pursuant to CEQA Guidelines section 15130(e). Additionally, pursuant to CEQA Guidelines section 15183(j), if a cumulative impact was addressed adequately in a prior EIR for a general plan, and the project is consistent with that plan or action, then an EIR for such a project need not further analyze that cumulative impact.

5.4.2 Cumulative Analysis

5.4.2.1 Cumulative Development

As indicated above, discussion of cumulative impacts may consider either a list of past, present, and probable future projects producing cumulative impacts or a summary of growth projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts, such as those contained in a General Plan. The proposed Project would be constructed within the next two years, and thus, this analysis considers the list-based

approach for the cumulative analysis. Table 5-1 identifies recently constructed, approved, and pending projects in the downtown area and in proximity to the proposed Project. Currently 302 residential units are under construction and approximately 761 residential units have been approved. In addition, there are pending permit applications for 130 residential units in the downtown area. These cumulative projects also would result in a net increase of approximately 13,455 square feet of commercial space.

Table 5-1: Cumulative Projects In Vicinity of Proposed Project (As of July 1, 2026)

Name/Address	Description	Status
<i>Under Construction</i>		
119 Lincoln-Downtown Library and Affordable Housing Project	Mixed-use project with 124 dwelling units, public library, approximately 6,460 square feet commercial space	Under Construction
902, 920 Pacific Avenue	Mixed-use project with 127 dwelling units and 10,000 square feet commercial space	Under Construction
136 River Street	Mixed-use project with 51 dwelling units approximately -3,800 square feet commercial space	Under Construction
<i>Approved</i>		
130 Center Street	233 dwelling units and approximately -10,540 square feet commercial space	Approved
903 Cedar Street	3 dwelling units	Approved
407 Pacific Avenue	Mixed-use project with 102 dwelling units and approximately -4,240 square feet commercial space	Approved
201 Front Street	Mixed-use project with 245 dwelling units and approximately 12,000 square feet commercial space	Approved
2020 N. Pacific Avenue	Mixed-use project with 178 dwelling units and approximately -2,725 square feet commercial space	Approved
<i>Pending Applications</i>		
1316 Pacific Avenue	Mixed-use project with 39 dwelling units and 3,330 square feet commercial space	Pending Application
901 Pacific Avenue	Mixed-use project with 91 dwelling units and approximately 2,970 square feet commercial space	Application under review

NOTE: Commercial square footage is approximate net commercial square footage unless that accounts for commercial square footage that accounts for commercial square footage that is demolished as part of project.

The Santa Cruz City Council adopted an updated General Plan 2030 in June 2012 after certifying the accompanying EIR. The analyses in the EIR provide an assessment of cumulative impacts within the City with projected growth in the City that could be accommodated by the General Plan and University of California Santa Cruz (UCSC) growth and development. Subsequent to certification of the General Plan 2030 EIR, the Santa Cruz City Council approved amendments to the City's *Downtown Plan* in May 2025 and certified the accompanying Santa Cruz Downtown Plan Expansion EIR that provided an updated citywide cumulative impact analysis (City of Santa Cruz 2025). The updated analysis included additional development than considered in the 2012 General Plan 2030 EIR that included: approximately 5,360 new residential units; a net reduction in commercial and office space of 90,000 and 3,500 square feet, respectively; an increase of approximately 46,500 square feet of industrial space; and approximately 400 new hotel rooms throughout the City. Cumulative development included projects under construction, approved development projects, projects with pending permit applications, and anticipated growth of approximately 1,732 dwelling units in an expanded area covered by the City's Downtown Plan. Future growth at UCSC and improvements and expansion of the Santa Cruz Wharf also were considered in the EIR.

5.4.2.2 Cumulative Impact Analysis

The Project consists of replacement of an existing single-family residential unit with a similarly sited and sized single-family home, and thus, the Project would not result in a net increase in residential units. The proposed Project is consistent with the *General Plan 2030* land use designation for the site, but the cumulative analysis in the General Plan EIR is outdated for some topics as residential development has exceeded the amount considered in the General Plan 2030 EIR. The Project site is not located within the boundaries of the City's *Downtown Plan*, although the Downtown Plan EIR provided updated cumulative analyses based on additional development and growth forecast at the time the EIR was prepared. The following sections evaluates cumulative impacts to which the Project would contribute, and conclusions of the General Plan 2030 EIR and Santa Cruz Downtown Plan Expansion EIR are noted, where relevant.

Aesthetics

The geographic area for consideration of cumulative impacts would be the Project site and the surrounding area from which the Project site may be visible. There are no other cumulative projects that are within the same viewshed as the Project. Therefore, no cumulative aesthetics impacts have been identified.

Air Quality and Greenhouse House Emissions

The geographic area for consideration of cumulative impacts would be the North Central Coast Air Basin in which the Project site is located. According to the Monterey Bay Air Resources District's (MBARD) CEQA Guidelines, "A consistency analysis and determination serve as the project's analysis of cumulative impacts on regional air quality. Project emissions which are not consistent with the AQMP (Air Quality Management Plan) are not accommodated in the AQMP and will have a significant cumulative impact unless offset." As discussed in the Initial Study (Appendix A), the Project was found to be consistent with the AQMP based on use of the District's methodology. Therefore, the Project's contribution to cumulative air emissions would not be cumulatively considerable.

Greenhouse gas (GHG) emissions and effects on global climate change extends beyond the local air basin and is a world-wide issue. However, based on the analysis in the Initial Study, the Project's contribution to global GHG emissions would not be cumulatively considerable.

Biological Resources

The geographic area for consideration of cumulative impacts would be the Project site and areas supporting biological resources similar to those that exist at the Project site. As discussed in the Initial Study (Appendix A), there are no sensitive habitats or special status species that occur on the Project site, and therefore, the Project would not contribute to cumulative impacts related to these resources.

Potentially significant impacts to nesting species, if present, at the time of tree removal could occur at the Project site and at other cumulative project sites. However, as discussed in the Initial Study, a standard City Condition of Approval (COA) requires pre-construction nesting surveys to determine if nesting birds are present and if so to delay construction in order to avoid impacts to nesting birds. Thus, the Project's impact would be avoided and potential Project contribution to a cumulative impact to nesting birds would not be considered cumulatively considerable.

Cultural and Tribal Cultural Resources

The geographic area for consideration of cumulative impacts to archaeological and tribal cultural resources would be the Project site and areas supporting any identified resources. An archaeological resources investigation conducted for the Project did not identify archaeological or tribal cultural resources on or adjacent to the Project site, and therefore, the Project would not contribute to cumulative impacts related to these resources.

The geographic area for consideration of cumulative historical impacts would be the Project site and areas supporting cultural resources within the Historic District. None of the cumulative projects identified in Table 5-1 are located in the Historic District, and therefore, cumulative projects would not result in a cumulative impact to resources within this district. In addition, for those cumulative projects listed in Table 5-1 that had structures that were 50+ years in age and that were required to submit a historical resources report to determine if structures were historical resources under definitions in CEQA and CEQA Guidelines, no historical resources were identified as a result of these required reports.

Geology and Soils

The geographic area for consideration of cumulative impacts would be the Project site and areas within similar seismic or geologic hazard areas as the proposed Project. Some of cumulative projects identified in Table 5-1 may also be subject to liquefaction, and all cumulative projects are subject to seismic hazards. All cumulative projects greater than four units in size and those in areas subject to liquefaction would be subject to City requirements for preparation of geotechnical studies. Cumulative projects would be designed based on site-specific conditions and recommendations provided in required geotechnical investigations. Therefore, no significant cumulative impacts would occur regarding seismic, geological and soils constraints. Similarly, potential erosion impacts would be avoided with implementation of required erosion control measures and stormwater best management practices required by the City.

Hazards and Hazardous Materials

The geographic area for consideration of cumulative impacts would be the Project site and areas where hazardous materials are used or exposure to hazards is present. The proposed Project is a residential use that would not use, transport or dispose of hazardous materials other than typical household products, and the site is not on any list of hazardous material sites compiled pursuant to Government Code 65962.5 ("Cortese List") as explained in the Initial Study prepared for the Project that is included in Appendix A. Thus, the Project would not contribute to potential cumulative impacts regarding hazards or hazardous materials. While the Project site is located within a wildland fire hazard area, the Project complies with all City Fire Department requirements.

Hydrology and Water Quality

The geographic area for consideration of cumulative impacts would be the Project site and areas within the same drainage area in which the Project site is located. There are no other cumulative projects that are within the same drainage area as the Project site. Therefore, there are no known cumulative impacts related to hydrology and water quality. Furthermore, the Project's stormwater/drainage plan includes onsite stormwater detention and release at pre-project levels, and the Project would not result in a cumulative considerable contribution to stormwater increases.

Noise

The geographic area for consideration of cumulative impacts would be areas in proximity to the Project site with similar exposure to noise levels as the Project site and which could contribute to potential permanent and temporary noise increases. There are no other cumulative projects that are near the Project site that would contribute to cumulative temporary or permanent noise increases.

Cumulative development would contribute to increased trips on area roadways. The General Plan 2030 EIR identified potential significant cumulative impacts related to noise along streets due to increased traffic for Swift Street north of Delaware and Mission Street between Bay Street and Walnut Street. The proposed Project is not located in this area. The Santa Cruz Downtown Plan Expansion EIR provided updated traffic noise modeling that considered regional growth and approved development projects as noted above in Section 5.4.2.1. The analysis concluded that Laurel Street, between Center Street and Front Street, would experience noise increases of 3.7 to 4.3 decibels that would exceed 3 decibels over existing conditions, resulting in a significant cumulative noise impact related to traffic noise level increases (City of Santa Cruz 2025). The proposed Project is located north of Laurel Street and would contribute trips to the impacted segment. However, the Project consists of replacement of an existing single-family residence and would not result in substantial increased trips of a magnitude to affect sound levels along area streets. Therefore, the Project's contribution to a significant cumulative noise impact resulting from increased traffic would not be cumulatively considerable.

Population and Housing

The geographic area for consideration of cumulative impacts would be City of Santa Cruz based on regional population and housing forecasts. The General Plan 2030 EIR identified cumulative population growth as a potentially significant impact due to growth at the University of California Santa Cruz (UCSC) in conjunction with growth accommodated by the General Plan. The EIR concluded that cumulative growth (City and UCSC) could result in an average annual growth rate that would exceed historical growth rates, resulting in a potentially significant cumulative impact. However, the EIR also indicated that regional population forecasts are updated every four years by AMBAG, which would account for changing population trends.

The City's existing population as of January 1, 2026 was 63,065 (California Department of Finance 2026). The proposed Project would not result in a net increase in residential units as it consists of replacement of one existing single-family dwelling unit, although two additional bedrooms are included in the project which, could potentially generate an additional 2-3 residents. Cumulative development would result in construction of 3,422 new residential units throughout the City¹. The associated population, including the Project, would be approximately 6,847 residents based on an average household size of 2, which is slightly less than the City's existing household size of 2.2 persons/unit as many units in the downtown area or in other mixed-use development projects that are known to have a lower household size (City of Santa Cruz 2025). The resulting population would be 69,912, which would exceed AMBAG's population forecast of 68,057 for the year 2030, but would be within the year 2035 population forecast of 71,343. Not all cumulative projects would be constructed by the year 2030 as some have not been approved, and many approved projects have not yet applied for building permits. While overall population increases resulting from cumulative City development would be within population forecasts for the year 2035, with projected

¹ As of June 30, 2026, based on information provided by the City of Santa Cruz Community Development Department that includes: 175 dwelling units (dus) finalized in 2026, 946 dus under construction, 2,170 approved dus, and 131 dus with pending permit applications.

growth at UCSC, population in the year 2030 or 2035 could exceed AMBAG's forecast, resulting in a potentially significant cumulative impact.

As of January 1, 2026, there were 25,066 housing units in the City (California Department of Finance). The current regional housing forecast for the City of Santa Cruz estimates 26,441 housing units in the City in 2030 and 27,499 housing units in the year 2035. Existing and cumulative development within the City would total 28,488 housing units, which would exceed regional housing forecasts in both 2030 and 2035, resulting in a potentially significant cumulative impact.

Therefore, cumulative development within the City could result in a potentially significant impact related to population and housing as cumulative development would result in new housing units and population that could exceed regional population and housing forecasts in the year 2035 and potentially 2030. The proposed Project would result in replacement of one existing single-family dwelling unit with a new unit with two additional bedrooms. The potential for two to three additional people with the additional bedrooms would be minor, and thus, the Project's contribution to a potentially significant population impact would not be cumulatively considerable. As a replacement dwelling, the Project would not contribute to cumulative increases in housing units. In addition, as indicated in the General Plan 2030 EIR, regional population forecasts are updated every four years by AMBAG, which would account for changing population trends.

Public Services and Utilities

The geographic area for consideration of cumulative impacts would be the City of Santa Cruz service area in which the Project site is located. All City services supplied to the Project site include the entire City, except for water service, which also includes areas located outside the City. The General Plan 2030 EIR identified potentially significant cumulative impacts to schools and water supply. An updated cumulative impact analysis included in the City's Downtown Plan Expansion EIR also identified potentially significant cumulative impacts to schools and water supply but did not identify potentially significant cumulative impacts to other public services (fire and police protection, parks and recreation) and utilities (wastewater treatment and solid waste) (City of Santa Cruz 2025). Based on the most recent cumulative analysis in the Santa Cruz Downtown Plan Expansion EIR, the proposed Project's reconstruction of one single-family home would not result in new significant impacts to fire and police services, parks and recreational facilities, wastewater treatment or solid waste disposal. Potential cumulative impacts related to schools and water supply are evaluated below.

Schools. Cumulative development could affect school enrollment at schools serving the Project site and downtown area, which include Bay View Elementary, Gault Elementary, Mission Hill Middle School, and Santa Cruz High School, which are within the Santa Cruz City Schools. The capacity of each school is provided in the City's General Plan EIR (City of Santa Cruz 2012). Current enrollment data as reported by California Department of Education is compared to capacity as reported in the City's General Plan in Table 5-2.

As shown in Table 5-2, all schools serving the Project site and downtown area are currently below capacity. The proposed Project consists of replacement of an existing single-family residence with a unit of similar size and would not result in a net increase in residential dwelling units. The proposed Project includes two additional bedrooms than currently exist, which may slightly increase average household size. Based on the District's updated student

generation rate of 0.2132 students per household², cumulative development, including the Project, would result in approximately 190 students.

Table 5-2. School Capacities and Enrollments

School	Capacity ¹	Current Enrollment ²
Bay View Elementary	604	407
Gault Elementary	480	322
Mission Hill Middle	690	497
Santa Cruz High	1,362	1,060
Total	3,136	2,286

¹ As reported in the City's General Plan 2030 EIR (City of Santa Cruz 2012)

² For School Year 2025-2026. California Department of Education. 2026. California School Directory-School Profiles. Available online at: <https://www.cde.ca.gov/SchoolDirectory/>.

Census enrollment data shows that the split of enrollment between elementary, middle, and high school is 51%, 27%, and 23% respectively (City of Santa Cruz 2025). Using these assumptions and the Census data split for enrollment, cumulative development would potentially generate approximately 97 new elementary school students, 50 middle school students and 43 high school students based on the Santa Cruz City School's student generation rate. All schools serving the Project and downtown area have adequate remaining capacity to support potential cumulative student enrollment based on current enrollments shown on Table 5-2 and school capacities identified in the General Plan 2030 EIR (SOURCE V.1b-DEIR volume). Thus, cumulative development would not result in a significant impact regarding schools, and expansion of existing school facilities or construction of new school facilities would not be required to serve cumulative development.

Furthermore, in accordance with Section 65995(h) of the California Government Code, cumulative development projects would be required to pay school impact fees to Santa Cruz City Schools at the time of building permit issuance. These fees are used to mitigate impacts associated with long-term operation and maintenance of school facilities. School fees from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment growth within the school district service area and would allow for the School District to allocate these funds as deemed necessary. Pursuant to Government Code Section 65995, payment of development fees is "full and complete mitigation" for impacts on schools.

Water Supply. The proposed Project would contribute to significant cumulative impacts related to water supply identified in the General Plan 2030 EIR and in the Santa Cruz Downtown Plan Expansion EIR. Subsequent to the certification of both these EIRs, the City completed the 2025 Urban Water Management Plan (UWMP), which was adopted by the City Council pursuant to state law. The hydrological modeling and analyses conducted for the 2025 UWMP, as described in the Initial Study in Appendix A, found that under historic hydrological conditions, water supply would meet projected demand under all conditions. Under the selected climate change condition, water supply would meet projected demand under normal/average year and single-dry year conditions in all years through

² Based on an average generation rate of .2132 students per household per the SCSDs 2024 Developer Fee Justification Study for the Santa Cruz School Districts, Schoolworks Inc., June 2022, page 5.

2050. Under the selected climate change condition in the five-consecutive year drought condition, in 2030 a small shortage (four percent) could occur in the fifth year of the drought sequence, but after 2035, implementation of planned projects would provide adequate supply to meet projected demand through 2050 (City of Santa Cruz 2026). Given potential water supply shortfalls during some years of a multi-year drought, this is considered a potential significant cumulative impact without implementation of the City's water supply augmentation projects and strategies. The 2025 UWMP found that while the City remains vulnerable to extreme drought, particularly in the near term, the planned projects that the City is actively pursuing are expected to provide adequate supply to reliably meet projected demand through 2050. In the event that supplies fall short of demand resulting in a water shortage emergency, the Water Shortage Contingency Plan would be implemented (City of Santa Cruz 2026).

Cumulative development projects would be subject to City requirements for installation of water-conserving fixtures and landscaping in accordance with current Municipal Code and building requirements. Under multi-year drought conditions, the Project, like other City customers, would be subject to water use restrictions. The increase in water demand due to the proposed Project would be negligible as the Project consists of reconstruction of an existing single-family dwelling, and Project water use would not substantially exacerbate water supply reliability in the future or during a drought because the amount of additional demand when spread across all service area customers would not result in any noticeable increase in the timing or extent of curtailment in customer use that would otherwise be implemented during drought conditions.

In addition, the Project would pay the required "System Development Charge" that is required for a new or upgraded service connection or where a project adds new water use types. This charge, as set forth in Chapter 16.14 of the Municipal Code, funds public water system improvements, and is assessed so projects pay the proportional share of the costs of new and existing water facilities necessary to meet the demand resulting from new or enlarged water services. This charge is intended to mitigate the water supply impacts caused by new development in the City's water service area, and the funds are used for construction of public water system improvements and conservation programs. Payment of the System Development Charge and implementation of other water conservation measures would mitigate the project's contribution to cumulative water supply impacts. Therefore, the Project's incremental contribution to a significant cumulative water supply impact would not be cumulatively considerable.

Transportation/Traffic

The geographic area for consideration of cumulative impacts would be within the City and region. CEQA Guidelines section 15064.3, subdivision (b) codifies the switch from level of service (LOS) to vehicle miles traveled (VMT) as the metric for transportation analysis pursuant to state legislation adopted in 2013, which made significant changes to how transportation impacts are to be evaluated under CEQA as explained in the Initial Study included in Appendix A of this EIR. The proposed Project would not result in a significant impact related to VMT based on the City's adopted thresholds and guidelines as explained in the Initial Study. The State Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) that were used to develop the City's VMT Guidelines indicates that a project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less-than-significant cumulative impact (California Office of Planning and Research 2018). Thus, cumulative development would not result in significant cumulative impacts related to transportation.

Wildfire

The geographic area for consideration of cumulative impacts would be the City of Santa Cruz. As indicated in the Initial Study prepared for the Project that is included in Appendix A of this EIR, the Project site is not located within a high fire hazard area. The Project is located in an urban area and does not contain significant sources of flammable materials (e.g., timber land). The Project would not significantly increase exposure to wildland fire hazards or exacerbate wildfire risks as the site is not located adjacent to or in proximity to a wildfire hazard area. The Project would not require installation of infrastructure that would exacerbate fire risks. New utility connections to the Project site would be underground within an existing developed urban area. The Project would meet all City requirements for access, and the building would be required to install fire sprinkler systems in accordance with City regulations.

The General Plan 2030 EIR indicated that future growth could result in an indirect increased risk of wildfires in the urban-rural interface and adjacent to the City's greenbelt areas. The EIR indicates that areas targeted as "likely" to have a wildland fire include the Arroyo Seco/Meder Canyon, DeLaveaga, Pogonip, Moore Creek area and Arana Gulch, and future growth in these areas could result in an indirect increased risk of wildfires in the urban-rural interface and adjacent to the City's greenbelt areas. The Project site is not located within or near these urban-rural interface areas, and thus would not contribute to potential cumulative wildfire impacts.

5.5. Project Alternatives

5.5.1 Introduction

According to State CEQA Guidelines (section 15126.6), an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Because an EIR must identify ways to mitigate or avoid the significant effects, the Guidelines further require that the discussion focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening a significant impact even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible.

The lead agency is responsible for selecting a range of potentially feasible project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR needs to examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

As indicated above an EIR must consider a reasonable range of potentially feasible alternatives and is not required to consider alternatives which are infeasible. "Feasible" means capable of being accomplished in a successful

manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines, section 15364). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or already owns the alternative site) (CEQA Guidelines section 15126.6(f)(1)). None of these factors establishes a fixed limit on the scope of reasonable alternatives. The concept of feasibility also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, feasibility under CEQA encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors. Agency decision makers ultimately decide what is “actually feasible”. The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project.

An EIR need not evaluate the environmental effects of alternatives in the same level of detail as a proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project. The alternatives analysis also should identify any significant effects that may result from a given alternative.

5.5.2 Summary of Impacts and Project Objectives

5.5.2.1 Significant Project Impacts

The following potentially significant impacts have been identified. Impact CUL-2 can be mitigated to a less-than-significant level, but Impact CUL-1 cannot and is a significant unavoidable impact.

- **Impact CUL-1** The Project would cause a substantial adverse change in the significance of a historical resource that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in CEQA Guidelines section 15064.5.

As discussed in Section 4.1, demolition of the historical resource at 307 Chestnut Street, which is a contributing building to the NRHP Historic District, would result in a substantial adverse change to a historical resource. Implementation of MM-CUL-1 would document and preserve information about the resource, but would not reduce the direct impact to the historical resource at 307 Chestnut Street resulting from demolition to a less-than-significant level. Therefore, the impact to 307 Chestnut Street would remain significant and unavoidable because the Project would demolish the building’s character-defining features, which defines the building as a historical resource, causing it to no longer be capable of conveying its significance as a contributor to the Historic District.

As discussed in Section 4.1, the Project has been designed to minimize impacts to the Historic District because the replacement construction would meet Standards 9 and 10 of the Secretary of the Interior’s Standards for Rehabilitation. Although the design has not yet been finalized, implementation of MM-CUL-2 would require the preparation of a Historic Monitoring Plan to ensure the final design remains consistent with the Secretary of the Interior’s Standards. As a result, the Historic District would continue to convey its significance following the construction of a new building at 307 Chestnut Street. Therefore, the impact of the Project to the Historic District would be less-than-significant with mitigation.

5.5.2.2 Summary of Project Objectives

The objectives of the proposed Project as described in Section 3, Project Description are:

1. Replace an existing dilapidated, unsafe, and energy inefficient home with a new home that meets current energy and building code requirements, with modern features and amenities.
2. Provide a simple two-story, rectangular structural design that is compatible with the Historic District, consistent with the City's General Plan 2030 (HA1.9).
3. Upgrade condition of an existing housing unit.
4. Maximize the density on site, consistent with the City's General Plan 2030 (LU3.7.1).

5.5.3 Alternatives Analysis

5.5.3.1 Alternatives Considered and Eliminated From Further Consideration

Section 15126.6(c) of State CEQA Guidelines indicates that the range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. In developing the alternatives, consideration was given to modification and/or elimination of Project elements or recommendations that would eliminate or substantially reduce identified significant impacts while attaining most of the Project objectives.

The EIR also should identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.

The City considered the following alternatives, but eliminated them from further discussion.

Construct Replica Building

A project that includes replication of an existing historic structure would not be consistent with the Secretary of the Interior's Standards for Rehabilitation of historic properties. The Standards specifically call for new additions or new related construction to be differentiated from the preserved historic building to protect the historic compatibility of the property (Standard 9). The Standards do not call for replication of a historic resource, although reconstruction may be recommended in some situations. According to the National Park Service, reconstruction is defined as "the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location." Reconstruction is the fourth treatment standard for historic resources after preservation, rehabilitation, and restoration, and is intended for use in those instances where the historic building or feature is no longer present. Since this is not the case with the proposed Project as the historic structure currently exists, reconstruction as a replica would not be an appropriate alternative with regards to mitigation of impacts to a historical resource. Thus, replication would not be an appropriate alternative for the significant impact of demolition of a historic resource and was eliminated from further consideration.

Relocation of Historic Building

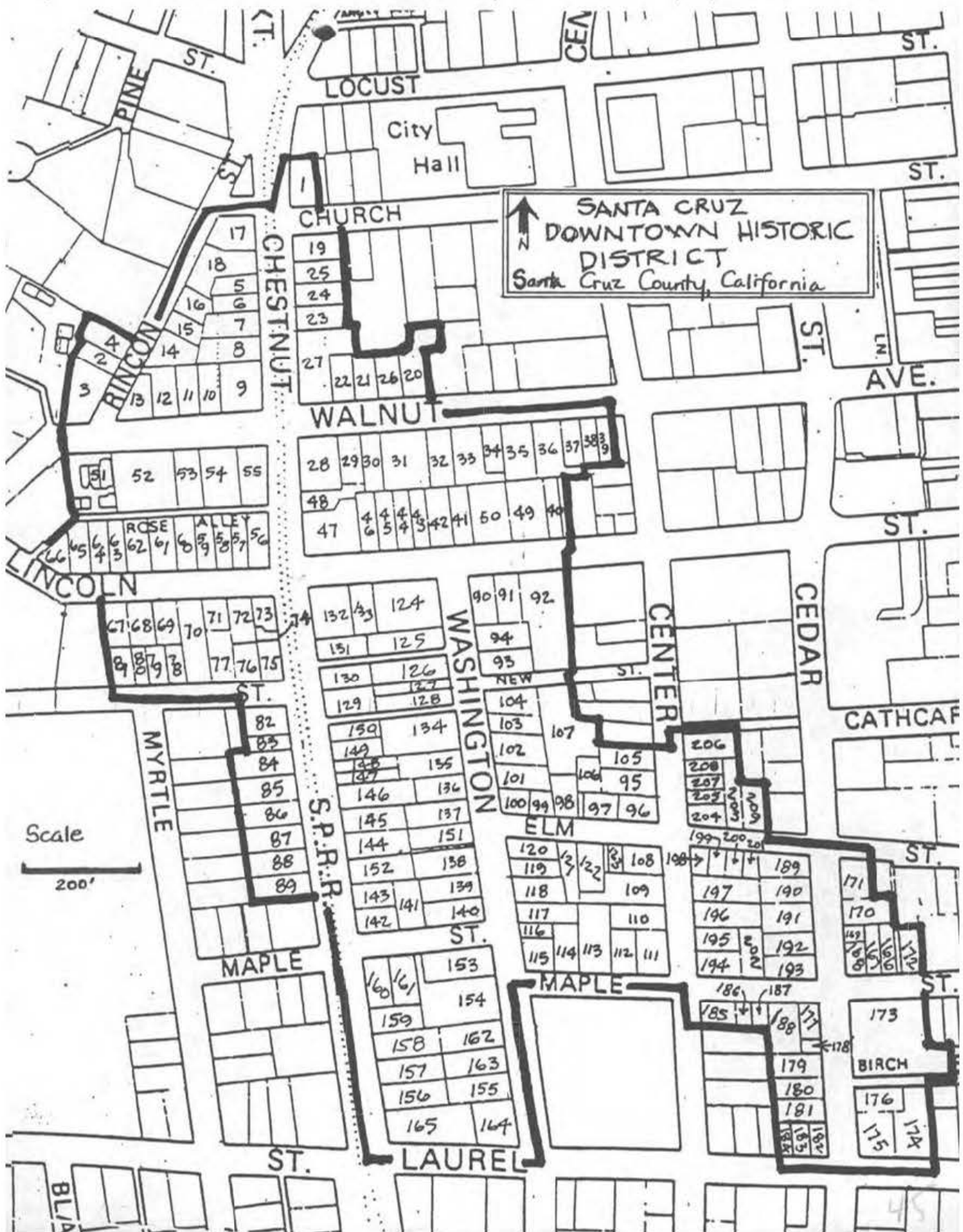
The first consideration in discussing the feasibility of relocation is the potential for finding an appropriate new location where the building can still convey its significance. The second consideration is the physical feasibility of moving the building.

Relocation should be considered only in situations where relocation is the only feasible alternative to demolition. In these cases, relocation may mitigate a significant impact to a less-than-significant level provided that the new location is compatible with the original character and use of the historical resource and the resource retains its eligibility for listing on the NRHP and the CRHR (14 CCR section 4852(d)(1)). To ensure that the building is not destroyed or damaged during the move, a treatment plan for the move would need to be prepared, as well as, plans to rehabilitate the building once it is relocated (California Office of Historic Preservation 2001). Furthermore, establishing an appropriate use of the building, along with agreement on continued responsibility for maintenance would be necessary.

Finding a new location entails identifying a suitable parcel of land in downtown Santa Cruz that is available for development and purchase by the applicant. To maintain the building's status as a contributing building to the Historic District, any potential relocation site would need to be located within the boundaries of the Historic District (see Figure 5-1) and retain a setting that is compatible with the historic residential character for which the Historic District is significant. Relocation outside the Historic District would remove the building from the geographic area that contributes to its significance as a contributor to the Historic District and would not preserve its historic association with the Historic District. There are no known vacant properties in the Historic District area that are not part of a planned future development or that do not support a contributing structure to the Historic District. Therefore, it appears that there are no sites that could accommodate relocation of the building. In addition, there are no other nearby sites within the Historic District that are owned by or available to the applicant that could be used.

The second key factor in determining the feasibility of relocation as a viable alternative is determining if the building can be physically moved. According to the structural assessment prepared by R3 Consulting Engineers (R3 Consulting Engineers 2026), and a letter prepared by Kevin T. Hernan Construction (Hernan 2026), evaluating the condition of the building at 307 Chestnut Street, due to the nature of the historic buildings' existing condition, it is presumed that this alternative would involve deconstruction of the existing building followed by reconstruction at a new location. Existing non-structural partition walls would be demolished and recycled. A new foundation would be built at the new site, and all salvaged elements would be reassembled. The building would be reconstructed as close to its original form as possible, while upgrading the building to meet current building codes.

While this option is theoretically possible, it may not be economically or logistically feasible due to the condition of the existing building in addition to the other factors of feasibility discussed above. Thus, relocation of the historic building to an alternate location was eliminated from further consideration.



SOURCE: Mathews, C., J. Silberstein, and L. Pearson

FIGURE 5-1

Boundary of the Santa Cruz Downtown Historic District

307 Chestnut Street Residence Project

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Alternative Project Location

As indicated in Section 5.5, the CEQA Guidelines require that the discussion focus on alternatives to a project or its location, which are capable of avoiding or substantially lessening a significant impact. This alternative would involve development of the proposed Project on a different site rather than at 307 Chestnut Street. Under this alternative, the existing residence at 307 Chestnut Street would remain in place and would not be demolished. As a result, this alternative would avoid the significant and unavoidable impact to the contributing building and would preserve the integrity and historic significance of both 307 Chestnut Street and the Historic District.

In this case, however, the Project impacts are not a result of construction of a new building, but rather the impact is related to the demolition of the existing building that is required to accommodate the Project. Thus, this alternative represents the No Project Alternative, which is reviewed in Section 5.5.3.2. Furthermore, to be feasible, an alternative parcel of land would need to be available for acquisition or development by the applicant and capable of accommodating a residence of a similar size, scale, and function as the proposed project. Although the alternative site would not need to be located within the Historic District, it would need to support the basic objectives of the Project, including replacing an existing dilapidated, unsafe, and energy-inefficient residence with a new home that meets current energy and building code requirements; upgrading the condition of an existing housing unit; providing a simple two-story residential design compatible with the surrounding neighborhood context; and maximizing residential density on the existing project site consistent with General Plan Policy LU3.7.1. This alternative would not fully achieve several of the Project's objectives because it would not replace or improve the existing housing unit located at 307 Chestnut Street. In addition, implementation of this alternative would require identification and acquisition of a suitable residential parcel, redesign of the Project to accommodate different site conditions and development standards, and separate discretionary approvals, all of which are uncertain. Therefore, this alternative is eliminated from further detailed consideration.

5.5.3.2 Alternatives Evaluation

Based on the above discussion, this section evaluates the following potentially feasible alternatives:

- No Project: Required by CEQA
- Alternative 1: Full Rehabilitation
- Alternative 2: Partial Preservation

Each alternative is described and analyzed below, and the ability to meet project objectives also is addressed.

No Project Alternative

Section 15126.6(e) of the State CEQA Guidelines requires that the impacts of a “no project” alternative be evaluated in comparison to the proposed project. Section 15126(e) also requires that the No Project Alternative discuss the existing conditions that were in effect at the time the Notice of Preparation was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Project Description. Under the No Project Alternative, the proposed Project would not be approved, and therefore, none of the identified Project impacts would occur. For the purpose of the Alternatives discussion, the No Project Alternative assumes that in the foreseeable future, another project to redevelop the site could be proposed.

Impacts. The No Project Alternative would not result in construction of the proposed Project and none of the impacts identified in this EIR would occur. No new significant impacts would occur under this alternative. The No Project Alternative would avoid the significant and unavoidable impact to the contributing building and would preserve the integrity and historic significance of both 307 Chestnut Street and the Historic District. None of the other Project impacts that were found to be less than significant would occur. However, it is possible that some form of residential project would be proposed at some point in the future, although the type and timing of such a project are not known. Thus, impacts to the historical resource at 307 Chestnut Street identified in this EIR could result at some unknown time in the future.

Ability to Meet Project Objectives. The No Project alternative would not meet any of the Project objectives.

Alternative 1: Full Rehabilitation

Project Description. Alternative 1, Full Rehabilitation, would retain and rehabilitate the existing building at 307 Chestnut Street in its current location in accordance with provisions of the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings (Standards) (National Park Service 2017) and the California Historical Building Code (CHBC). Since the 307 Chestnut Street structure is considered a historical resource, the relevant provisions of the Secretary of the Interior's Standards and the CHBC would apply.

The Standards provide guidance for repairing, replacing, and upgrading deteriorated historic features and building systems while retaining a property's historic character. The Standards specifically recognize that deterioration does not necessarily warrant demolition and support the in-kind or compatible replacement of extensively damaged structural elements, including foundation and framing systems, when repair, rehabilitation, or evidence-based replacement can facilitate the continued use of a historic building (National Park Service 2017: 123). The CHBC provides regulatory flexibility specifically intended to enable the rehabilitation and continued use of historic buildings. The alternative provisions for residential occupancy, fire and life safety, means of egress, structural rehabilitation, and historic materials suggest that many of the code-related challenges associated with rehabilitating the resource could potentially be addressed while retaining its historic character.

A structural assessment prepared by R3 Consulting Engineers (R3 Consulting Engineers 2026), and a letter prepared by Kevin T. Hernan Construction (Hernan 2026), evaluating the condition of the building at 307 Chestnut Street concluded that substantial material repair/replacement, seismic retrofit, and code-compliance work would be required to rehabilitate the building. The available documentation therefore indicates that rehabilitation would likely require extensive intervention to address the building's existing condition, altered materials, and functional deficiencies. Due to the combination of nonconforming framing practices, material deterioration from dry rot, termite damage, and inadequate foundation support, the majority of the existing floor and wall framing is considered to be in non-serviceable condition and not suitable for reuse, and the existing foundation system is not suitable for continued use without substantial modification or replacement (R3 Consulting Engineers 2026).

Additional information provided by the applicant to the City indicates that the existing structure is single wall construction with masonry/post and pier foundation that was significantly damaged by the 1989 earthquake. The interior layout has substandard hallways, stairs, rooms, and windows, which would be made worse and not meet fire/egress if new walls were to be framed inside the existing single wall construction. Furthermore, the structure is situated in an area with high liquefaction that may affect foundation design, and according to the applicant, significant unequal settling of the structure has occurred, as well as, permanent bending and warping of structural

beams, and buckling along the south wall. The existing foundation is part mudsill, part post and pier, and partially supported by stacks of cinder blocks (likely added after the 1989 quake) and lacks the continuity to support a modern home.

As noted above however, the CHBC provides alternative provisions for residential occupancy that could address the deficiencies cited in the areas of fire and life safety, means of egress, structural systems, and historic materials. Similarly, under the Rehabilitation treatment approach, the Standards support the in-kind or compatible replacement of extensively damaged structural and material elements, including foundation and framing systems, as well as compatible new construction to support new and ongoing use of a historic building. There is no prescribed threshold at which the quantity of deteriorated historic material requiring replacement renders rehabilitation infeasible. Rather, the Standards recognize that severely deteriorated or failing historic materials may be replaced when repair is not feasible, provided the replacement conveys the same visual appearance, design, color, texture, and, where possible, materials as the historic feature.

While rehabilitation would reduce or avoid the significant impact associated with demolition as discussed below, the feasibility of such an option would depend on whether the building could be rehabilitated in a manner that meets applicable code objectives while retaining sufficient historic fabric and integrity. Based on the available information, rehabilitation appears to be technically feasible, however additional information would be necessary to determine whether rehabilitation could reasonably satisfy applicable code requirements. The Standards recognize that deteriorated historic materials may be repaired or replaced in kind when necessary, and the CHBC provides alternative compliance mechanisms intended to accommodate the continued use and rehabilitation of historic buildings while meeting applicable health and safety objectives. However, because the CHBC is administered by the local authority having jurisdiction, the City of Santa Cruz retains final authority to approve alternative methods, materials, and solutions proposed as part of a rehabilitation project involving a qualified historic resource. As such the alternative requires discretionary approvals which are uncertain. Additionally, the available documentation does not include sufficient information to evaluate its economic feasibility, such as conceptual rehabilitation plans, estimates for structural and code upgrades, or a comparison of rehabilitation costs relative to construction of the proposed Project.

Impacts. Overall, impacts to historic resources would be substantially reduced compared to the proposed Project because demolition of the contributing resource would be avoided and related impacts to the Historic District would also be reduced to a less-than-significant impact without the need for mitigation. If the design for the rehabilitation of the historical resources could comply with the Standards for Rehabilitation, the impact to the historical resource at 307 Chestnut Street and the impact to the Historic District would be reduced to a less-than-significant level and would not require mitigation. No new significant impacts would occur under this alternative. Other less-than-significant impacts identified for the Project would not change with this alternative.

Ability to Meet Project Objectives. Given the flexibility afforded under established historic preservation frameworks and treatment standards, the alternative would meet Project objectives regarding design (#2) and upgrading the condition of the existing housing unit (#3). The Standards and the CHBC provide mechanisms for rehabilitating and upgrading historic buildings while accommodating modern building systems, accessibility improvements, and life-safety requirements. However, rehabilitation of the existing building would not fully achieve the objective of replacing the existing residence with a new home (#1), although it would partially meet this objective with enhancing energy efficiency, life safety, and code compliance through rehabilitation. Alternative 1 also could constrain the

ability to maximize residential density on the site and meet this objective (#4), although additional density may potentially be accommodated through a compatible addition designed in accordance with the Standards.

Alternative 2: Partial Preservation

Project Description. This alternative involves the partial preservation of the existing historic building at 307 Chestnut Street through retention of the primary historic building facade and incorporating it into the new building. This alternative would involve the preservation of the primary, street-facing facade and the demolition of all secondary facades, structure, foundations, and roofs. The street facade would be disassembled in 8- to 10-foot-wide segments, stored at a different location, and re-assembled and incorporated into the Project after completion of subsurface work. Due to demolition of the remaining portions of the structure, it would not be possible to retain the facades in place during construction. Under this alternative, there would be no change to the proposed Project uses, except the design and site layout would be altered to incorporate the building facade of the existing on-site historic building.

Impacts. Under this alternative, the identified significant unavoidable impact related to historical resources would be slightly lessened but would not be reduced to a less-than-significant level. This alternative would be an improvement over the proposed Project based on the retention of some character-defining features, but it would still result in a significant unavoidable impact on the historic resource because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resource that convey its historical significance, and that justify their eligibility for inclusion in the NRHP. Because most of the structure would be demolished, potential Project impacts to the Historic District would continue to be significant, requiring implementation of Mitigation Measure CUL-2 to reduce the impact to a less-than-significant level. No new significant impacts would occur under this alternative, and other less-than-significant impacts identified for the Project would not change.

Ability to Meet Project Objectives. This alternative would meet all Project objectives.

5.5.3.3 Environmentally Superior Alternative

According to CEQA Guidelines section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Furthermore, Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines in Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

Table 5-3 presents a comparison of impacts of the proposed Project and the alternatives. The No Project Alternative would avoid all impacts identified for the proposed Project. Of the other alternatives considered, Alternative 1 would avoid the significant unavoidable impact to the historical resource located at 307 Chestnut Street and reduce the significant impact to the Historic District to a less-than-significant level. Alternative 2 would lessen the significant unavoidable historical resource impact than would occur with the proposed Project, but would not reduce it to a less-than-significant level. The impact to the Historic District would remain significant with mitigation with Alternative 2.

Of the alternatives considered, Alternative 2 would best achieve project objectives, but Alternative 1 would substantially reduce the severity of the identified significant impacts, while attaining most of the Project objectives. Therefore, Alternative 1 is considered the environmentally superior alternative for the purpose of the CEQA evaluation of the alternatives reviewed but the feasibility of this alternative is uncertain.

Table 5-3. Comparison of Impacts of Project and Project Alternatives

Environmental Issue	PP	NP	ALT 1	ALT 2
Cultural Resources CUL-1: Historical Resources Impact to 307 Chestnut Street Structure	SU	NI	LS	SU -
Cultural Resources CUL-2: Historical Resources Impact to Santa Cruz Downtown Historic District	LSM	NI	LS	LSM -
New Significant Impacts		None	None	None
Notes: PP = Proposed Project NP = No Project ALT1 = Full Rehabilitation ALT2 = Partial Preservation S = Significant LSM = Less than significant with mitigation SU = Significant unavoidable impact NI = No impact LS = Less than significant impact + = Greater adverse impact than proposed project - = Lesser adverse impact than proposed project				

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6.1 Agencies and Persons Contacted

City of Santa Cruz Community Development Department: Samantha Haschert, Rina Zhou

6.2 References

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6.3 EIR Preparation

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