

NATIVE AMERICAN HERITAGE COMMISSION

October 3, 2024

Justin Meek
City of Watsonville Community Development Department
250 Main Street
Watsonville CA 95076

Re: 2024090440 Watsonville 2050 General Plan Environmental Impact Report Project, Santa Cruz County

Dear Mr. Meek:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse



State of California – Natural Resources Agency
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October 8, 2024

Justin Meek, Assistant Community Development Director
City of Watsonville, Community Development Department
250 Main Street
Watsonville, CA 95076
justin.meek@watsonville.gov

Subject: Watsonville 2050 General Plan Environmental Impact Report, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2024090440, City of Watsonville, Santa Cruz County

Dear Mr. Meek:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Watsonville, Community Development Department's Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the Watsonville 2050 General Plan Environmental Impact Report (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City of Watsonville, Community Development Department, as the lead agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A California Endangered Species Act (CESA) Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86). CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065). In addition, pursuant to CEQA, the lead agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the lead agency makes and supports findings of overriding consideration for impacts that remain significant despite the implementation of all feasible mitigation. Findings of consideration under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires a Lake or Streambed Alteration (LSA) Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may

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substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: City of Watsonville

Objective: The City of Watsonville is preparing a comprehensive update of the Watsonville 2005 General Plan in response to changes in conditions in the City and new state laws enacted since the preparation of the existing General Plan. The projected growth in the 2050 General Plan envisions the addition of up to 5,980 new residential units and 1.725 million square feet of non-residential development. The 2050 General Plan will include goals, policies, and implementation actions – developed with extensive community input – to advance the City's vision and community priorities, including: revitalizing Downtown Watsonville; introducing a range of new housing choices, both single-family and multi-family; attracting new employment and revenue-generating uses; maintaining the existing character of the City's residential neighborhoods, preserving the City's natural open spaces, especially the sloughs; improving the City's existing parks and community facilities, and introducing new ones; accommodating planned passenger rail service, including a station in Downtown Watsonville; implementing complete streets improvements; and rerouting truck routes around town.

Location: The Project encompasses the City of Watsonville including five areas on noncontiguous land at the Watsonville Wastewater Treatment Plant, Buena Vista

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Landfill, Pinto Lake, Corralitos Water Filter Plant, and Browns Valley in Santa Cruz County.

Timeframe: 2050

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description including but not limited to the below information.

- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City of Watsonville may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to:

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Common Name	Scientific Name	Status
California red-legged frog	<i>Rana draytonii</i>	FT
Santa Cruz tarplant	<i>Holocarpha macradenia</i>	FE, ST
Tricolored blackbird	<i>Agelaius tricolor</i>	ST
Santa Cruz long-toed salamander	<i>Ambystoma macrodactylum croceum</i>	SP
Nesting birds		
Bats		
Rare plants		
Other aquatic and riparian species		

Notes:

FT = listed as threatened under the federal Endangered Species Act; FE = listed as endangered under the federal Endangered Species Act; ST = listed as threatened under CESA; SE = listed as endangered under CESA; SSC = state species of special concern; SP = state listed as fully protected; CRPR = California Rare Plant Bank.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service’s (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from “positive occurrence” databases such as California Natural Diversity Database (CNDDB). Only with sufficient data and information can the City of Watsonville adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at:
<https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations.

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Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Changes in hydrological conditions that could alter the timing and magnitude of streamflows both during construction and operation of the Project;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.
- Water quality impacts resulting from construction and operation of the Project;
- Impacts both from construction and operation of the Project;
- Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat;

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

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The CEQA Guidelines direct the City of Watsonville, as the lead agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

COMMENTS AND RECOMMENDATIONS

Based on the information provided in the NOP, CDFW offers the comments and recommendations below to assist the City of Watsonville in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and/or indirect impacts on fish and wildlife (biological) resources. These comments and recommendations are not an exhaustive list and CDFW may provide additional recommendations as more Project specific information is disclosed. The draft EIR must include a full Project Description, Environmental Setting, and Impact Analysis and Mitigation Measures as outlined above. Editorial comments or other suggestions may also be included to improve the document.

General Conservation Planning Comment: CDFW appreciates the 2050 General Plan will broadly include preserving the City's natural open spaces, especially the sloughs. While CDFW encourages and supports these goals, the Project has potential to significantly impact biological resources from Project related habitat loss in areas outside of open space and sloughs. Remaining riparian habitat along streams and tributaries to major sloughs and wetlands as well as uplands in the Project areas may provide important habitat and allow movement (connectivity) for a variety of special-status fish and wildlife species.

Comment 1: Riparian Setbacks: The Project has the potential to encroach into riparian vegetation (i.e., "riparian zone") from development. Encroachment into the riparian zone can adversely impact sensitive riparian and aquatic species through reduction of habitat and decreased water quality. Riparian zone encroachment also has the potential to increase flood risk in areas bordering the creek and accelerate erosion. Streambank stabilization activities are commonly needed in areas of riparian encroachment resulting in cumulative impacts over time.

Evidence impact would be significant: Riparian vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat, including thermal protection, cover, and large woody debris (Moyle 2002, CDFW 2007).

Justin Meek
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Development adjacent to the riparian zone can result in fragmentation of riparian habitat and decreases in native species abundance and biodiversity (Davies et al. 2001, Hansen et al. 2005, CDFW 2007). Riparian buffers help keep pollutants from entering adjacent waters through a combination of processes including dilution, sequestration by plants and microbes, biodegradation, chemical degradation, volatilization, and entrapment within soil particles. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosfokske et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Mitigation Measure 1: CDFW recommends the Project establish and the draft EIR incorporate riparian buffer zones along all rivers, lakes and streams to prohibit development and vegetation clearing to outside of and away from riparian areas. Riparian buffers should include all perennial, intermittent and ephemeral streams. CDFW is available to consult with the City to determine appropriate riparian buffers to reduce impacts to special-status species and riparian habitat to less-than-significant.

Comment 2: Santa Cruz Tarplant

Issue: The Project has the potential to impact Santa Cruz tarplant (*Holocarpha macradenia*) with the development of new residential units and non-residential units in the new Urban Limit Line (ULL) in Buena Vista Area.

Evidence the impact would be significant: Santa Cruz tarplant is an endangered species under CESA (Fish & G. Code, § 2050 et seq.). Species listed under CESA may not be taken² at any time except under the provisions of a Natural Communities Conservation Plan (NCCP), (Fish & G Code § 2081.7), a Memorandum of Understanding for scientific education or management purposes (Fish & G. Code §2081, subd. (a)), or an ITP (Fish & G. Code § 2081 (b)).

Santa Cruz tarplant is an annual species and the number of individuals recorded in a year is highly dependent on rainfall and other factors. Santa Cruz tarplant produces two types of seeds, ray achenes and disk achenes (USFWS 2014). Generally, the seeds fall within the vicinity of the plant and do not have a structural means for dispersal, although it is possible that some ray achenes may be dispersed long distances by animals (USFWS 2014). Ray achenes also form lasting seed banks with seeds that remain viable for an unknown amount of time, with seeds up to 15 years old successfully germinating (USFWS 2014). Surveys over consecutive seasons may be necessary to increase the likelihood of detection and account for variances in weather and other disturbances from year to year to determine the potential for take.

² Take is defined in Fish & G. Code, § 86 as hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

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Recommended Mitigation Measure 2 – Focused Survey: Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping, an experienced botanist, familiar with the native plant communities of Santa Cruz County shall conduct a focused Santa Cruz tarplant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire Project where potential Santa Cruz tarplant habitat has been identified, prior to the initiation of construction and the results shall be included in the Project environmental document. Surveys shall be conducted according to: Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (CDFW 2018), available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

Recommended Mitigation Measure 3 – Santa Cruz Tarplant Avoidance and Mitigation: If Santa Cruz tarplant is detected or likely to occur within the Project area, additional measures may be needed to avoid, minimize, and/or mitigate potential Project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the Project proponent shall obtain an ITP pursuant to Fish and Game Code section 2081, subdivision (b). (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9.) Information on the ITP process is available at <https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>. In addition, CDFW recommends continued coordination to develop additional measures.

Comment 3: Tricolored Blackbird (TRBL)

Issue: Tricolored blackbirds have the potential to occur within or near the Project site with the development of new residential units and non-residential units in the ULL and tricolored blackbird have been documented to occur near the Project area at the Highway 1 Gateway Area (CNDDDB, 2011 & 2014). Without appropriate avoidance and minimization measures for TRBL, potential significant impacts include nest and/or colony abandonment, reduced reproductive success, and reduced health and vigor of eggs and/or young.

Evidence impact would be significant: TRBL aggregate and nest colonially, forming colonies of up to 100,000 nests (Meese et al. 2014). Increasingly, TRBL are forming larger colonies that contain progressively larger proportions of the species' total population (Kelsey 2008). In 2008, for example, 55% of the species' global population nested in only two colonies, which were located in silage fields (Kelsey 2008). In 2017, approximately 30,000 TRBL were distributed among only 16 colonies in Merced County (Meese 2017). Nesting can occur synchronously, with all eggs laid within one week (Orians 1961). For these reasons, depending on timing, disturbance to nesting colonies can cause abandonment, significantly impacting TRBL populations (Meese et al. 2014).

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Recommended Mitigation Measure 4 – TRBL Habitat Assessment: CDFW recommends that a qualified biologist conduct a habitat assessment of the Project site in advance of Project implementation, to determine if the Project site or its vicinity contains suitable habitat for TRBL.

Recommended Mitigation Measure 5 - TRBL Surveys: CDFW recommends that Project activities be timed to avoid the typical bird breeding season (February 1 through September 15). However, if Project activities must take place during that time, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBL no more than 10 days prior to the start of implementation to evaluate presence/absence of TRBL nesting colonies in proximity to Project activities and to evaluate potential Project-related impacts.

Recommended Mitigation Measure 6 – TRBL Avoidance and Mitigation: If an active TRBL nesting colony is found during pre-activity surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer in accordance with CDFW's *"Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015"* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=99310&inline>) (CDFW 2015b). CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival. It is important to note that TRBL colonies can expand over time and for this reason, the colony may need to be reassessed to determine the extent of the breeding colony within 10 days prior to Project initiation. In the event that a TRBL nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code Section 2081(b), prior to any ground-disturbing activities.

Comment 4: California Red-Legged Frog (CRLF)

Issue: CRLF primarily inhabit ponds but can also be found in other waterways including marshes, streams, and lagoons, and the species will also breed in ephemeral waters (Thomson et al. 2016). The Project site contains habitat and CRLF have the potential to occur in the vicinity of the Project site. Avoidance and minimization measures are necessary to reduce impacts to CRLF to a level that is less-than-significant. Without appropriate avoidance and minimization measures for CRLF, potentially significant impacts associated with the Project's activities include burrow collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, and direct mortality of individuals.

Evidence impact would be significant: CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated. Habitat loss

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from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs are the primary threats to CRLF (Thomson et al. 2016, USFWS 2017).

Recommended Mitigation Measure 7 – CRLF Surveys: CDFW recommends that a qualified wildlife biologist conduct surveys for CRLF in accordance with the USFWS “Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog” (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83914&inline>) (USFWS 2005) to determine if CRLF are within or adjacent to the Project area.

Recommended Mitigation Measure 8 – CRLF Avoidance: If any CRLF are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for CRLF.

Comment 5: State Fully Protected Species within the Project Area

Issue: Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*) is a fully protected species that have the potential to occur within and in the vicinity the Project area.

Fully protected species, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.

Recommendation to minimize significant impacts: CDFW recommends that the Project completely avoid impacts to fully protected species.

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP in order to assist the City of Watsonville in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alexis Harrison, Environmental Scientist, at (707) 815-2779 or Alexis.Harrison@wildlife.ca.gov; or Wes Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77F9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

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October 9, 2024

Justin Meek, Assistant Community Development Director
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: Notice of Preparation of an Environmental Impact Report for the proposed City of Watsonville 2050 General Plan

Dear Mr. Meek:

Thank you for this opportunity to comment of the Notice of Preparation of a draft Environmental Impact Report (EIR) for the City's 2050 General Plan Update. The notice of preparation envisions future development for up to 5,980 new residential units and 1.725 million square feet of non-residential development. About 72% of the proposed development (4,320 residential units) is within city limits. However, it appears that the remaining 1,660 proposed units (28%), specifically Area A (Buena Vista Area) and Area G (West of Highway 1) are located outside the City's existing sphere of influence, as designated by the Local Agency Formation Commission of Santa Cruz County (LAFCO). Development of currently unincorporated areas would be subject to LAFCO's approval of future sphere amendments and annexation proposals at a later date.

Under the California Environmental Quality Act (CEQA), LAFCO is a Responsible Agency for this proposal, and will have regulatory authority for future applications for the proposed annexation application. It is in this role that LAFCO is commenting on the EIR.

Comments on Scope of the Draft EIR:

1. Conformance to State LAFCO Law and Locally Adopted LAFCO Policies
(Please provide an analysis in the draft EIR).

LAFCO's statutory authority is derived from the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (Government Code section 56000, et seq.). Among LAFCO's purposes are: Discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances (section 56301). The Cortese-Knox-Hertzberg Act identifies factors that must be considered, and determinations that must be made, as part of LAFCO's review of annexation proposals. These provisions of law are the legislative basis for LAFCO's locally adopted Policies and Procedures Relating to Spheres of Influence and Changes of Organization and Reorganization ("LAFCO Policies"), most recently updated March 6, 2024, which guide LAFCO's review and consideration of requests for annexation and other boundary changes. The full text of LAFCO's adopted Policies is available on LAFCO's web site: <https://santacruzlafco.org/about/policies-procedures/>.

If the EIR is approved, LAFCO will likely be requested, at a future date, to consider approval of one or more sphere amendments and/or annexation proposals for currently unincorporated sites in the proposed development areas, in accordance with the Cortese-Knox-Hertzberg Act and local LAFCO policies. As a CEQA Responsible Agency, LAFCO plans to use the City's environmental document to fulfill CEQA clearance for the annexation, and to support the evaluation of the proposal's consistency with the applicable LAFCO laws and policies, including adopted "Preservation of Open-Space and Agricultural Lands" and "City Jobs & Housing" policies, among others.

The City's Notice of Preparation makes no reference nor recognizes that the proposed development areas outside the city limits must also be evaluated for their consistency with LAFCO's sphere and annexation policies, including policies related to the logical expansion of urban boundaries and logical expansion of urban services and utilities.

LAFCO requests that the draft EIR being prepared include an analysis of the EIR's conformance to the full range of LAFCO's adopted policies and related State laws, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites. LAFCO staff can provide examples of similar analyses from other recent proposals. A more detailed, site-specific, and updated analysis to LAFCO laws and policies should also be anticipated as a required part of subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO. Provision of this information in current and future CEQA documents will help ensure that the Commission will have adequate information to act in its role as a CEQA Responsible Agency, when future Sphere amendments or annexation proposals for areas within the EIR are submitted to LAFCO.

2. Inclusion of Existing Extraterritorial Service Agreements (ESAs)

(Please address the general plan's consistency with the City's existing ESAs).

Our records indicate that the City of Watsonville has 17 active extraterritorial service agreements (ESAs) in place in accordance with Government Code Section 56133. The first ESA was approved in 1995 for the provision of water services, and the most recent ESA was approved in 2021 for water and sewer services. These agreements were approved to address health and safety issues and are meant to be precursors to annexation in the future. Attachment A shows the location of the ESAs. As the map shows, all 17 ESAs are located within the City's sphere, planning area, and immediately adjacent to the City's jurisdictional boundary.

At present, the general plan update does not reference the provision of sewer or water service to areas outside the city limits under these ESAs. Therefore, LAFCO is requesting that the City identify, catalog, and reference the ESAs within their general plan to reflect the current service delivery to the affected parcels outside the city but within its existing sphere boundary and planning area. Including these ESAs into the general plan would allow the City to plan for future annexations, if and when appropriate.

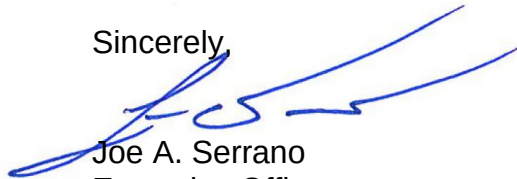
3. Conformance to the Adopted County Urban Services Line

(Please address the general plan's consistency with the County's USL).

Please include in the draft EIR an analysis of the general plan's consistency with the adopted 1979 County Urban Services Line, which does not appear to be discussed in the Notice of Preparation. Implementation of the general plan update may require revisions to the adopted USL and support from the County. Because such revisions would likely involve the potential for future sphere and annexation proposals, and would directly pertain to LAFCO's legislative purposes, LAFCO would like to have a role in any future modifications to the adopted USL.

Thank you again for this opportunity to comment on this proposal. Please continue to keep us informed throughout the process. I would be happy to meet with you and your consultants for more detailed discussions.

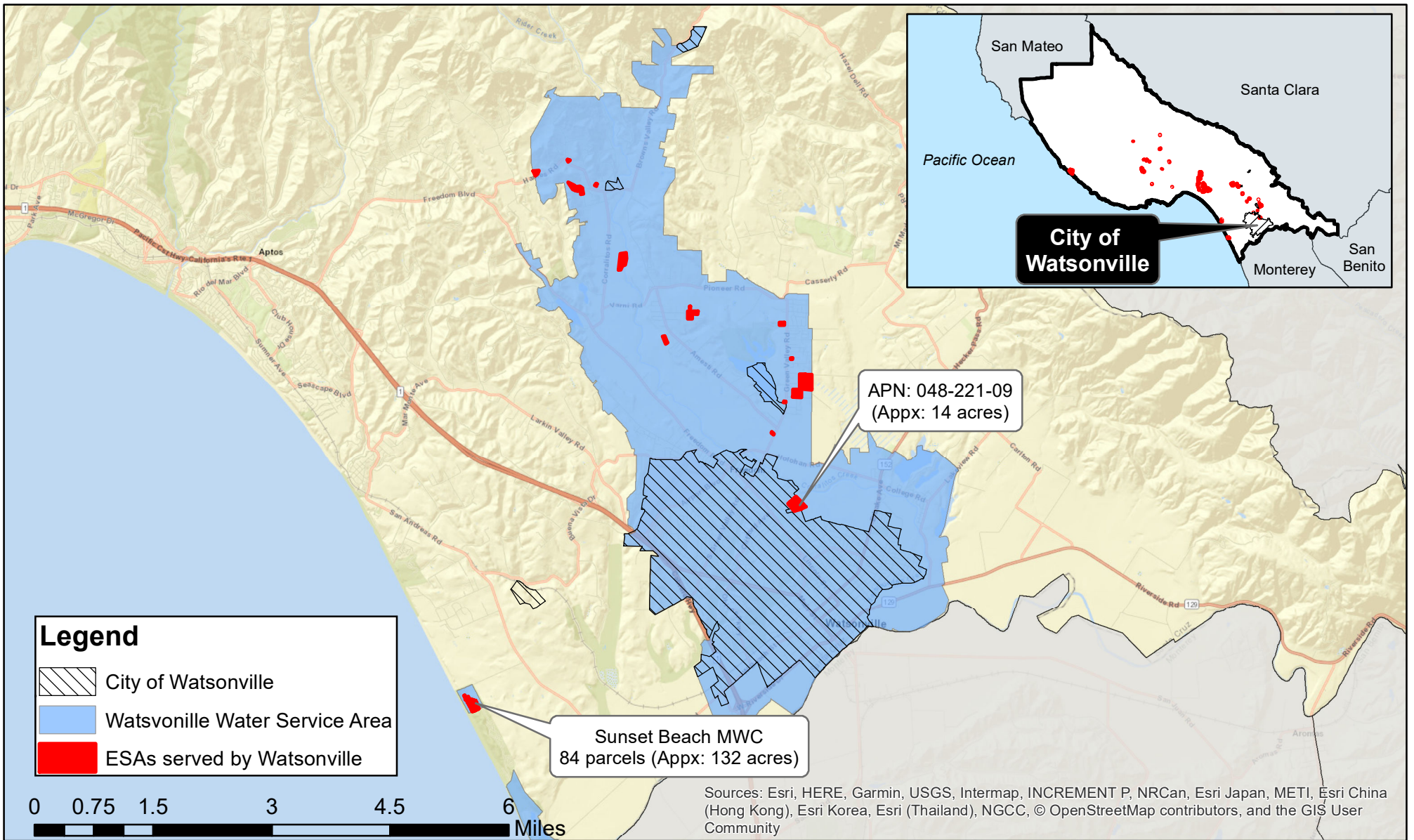
Sincerely,



Joe A. Serrano
Executive Officer

Attachment:

A) ESA Map



City of Watsonville List of Extraterritorial Service Agreements (17 in total)

The City of Watsonville has 17 ESAs on file. These ESAs provide services to 152 parcels totalling approximately 209 acres.

October 11, 2024

Justin Meek, AICP, Assistant Community Development Director
City of Watsonville
Community Development Department
250 Main St.
Watsonville, CA 95076

Re: Notice of Preparation – Watsonville 2050 General Plan Environmental Impact Report (EIR)

Dear Mr. Meek,

Thank you for providing the Monterey Bay Air Resources District (MBARD) with the opportunity to comment on the Notice of Preparation – Watsonville 2050 General Plan Environmental Impact Report (EIR). MBARD has reviewed the NOP and has the following comments:

Disadvantaged Community Status

A portion of the project area is designated as a disadvantaged community. MBARD recommends the City of Watsonville review the California Climate Investment Priority Population map found on the MBARD website (<https://www.mbard.org/ab-617-community-air-protection>) when addressing any potential land use and future growth in the General Plan.

Future Growth

Table 5-4 in the MBARD CEQA Guidelines lists examples of projects which could be indirect sources of ozone with potentially significant impacts. The project growth section of the NOP document states that 5,980 new residential units and 1.725 million square feet of non-residential development are envisioned in the future. These figures are well above the thresholds for potential significance stated in Table 5-4 and should be addressed in the EIR. While Table 5-4 can be used for screening projects and is for illustrative purposes only, the thresholds are based off the 137 lb/day emission threshold for significance. Therefore, projects exceeding these values should be evaluated quantitatively using a modelling approach.

EV Infrastructure

The Air District supports incorporating electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, the Air District suggests including publicly available dual port Level 2 & DC fast-charge charging stations throughout the project area.

VMT Reduction

A large component of the pollution generated within the North Central Coast Air Basin (NCCAB) emanates from traffic emissions. Beginning in September 2021, the NCCAB, under the supervision of MBARD, has maintained its attainment status with the State of California, regarding traffic related criteria pollution emissions. In order to continue to maintain this attainment status, MBARD recommends projects incorporate mitigation measures to limit Vehicle Miles Travel (VMT). Mitigation measures include walkable spaces within the community as well as the inclusion of bike lanes and trails. Additionally, an investment in a mass transit system utilizing electric vehicle technology can aid in limiting traffic and thus limiting emissions.

Sensitive Receptors

MBARD recommends the City of Watsonville take sensitive receptors into consideration as land use and future growth are addressed in the General Plan. Land use and future growth decisions can greatly influence the significance of an impact on local air quality, particularly if sensitive receptors would be affected. A “sensitive receptor” is generally defined as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (K-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing. Proper land use designations can minimize or eliminate significant impacts on local or regional air quality.

MBARD appreciates the opportunity to comment on the Notice of Preparation – Watsonville 2050 General Plan Environmental Impact Report (EIR). Please let me know if you have any questions. I may be reached at (831) 718-8030 or eballaron@mbard.org.

Regards,



Edward Ballaron
Air Quality Planner I

cc: Richard A. Stedman, Air Pollution Control Officer
David Frisbey, Planning and Air Monitoring Manager
Shawn Boyle, Planning and Air Monitoring Supervisor



Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

www.watsonvillewetlandswatch.org

"Dedicated to protecting, restoring and appreciating the wetlands of the Pajaro Valley"

October 11, 2024

Justin Meek, Principal Planner
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: NOP Comments for Preparation of the General Plan EIR

Dear Mr. Meek,

Thank you for providing our organization with the City's Notice of Preparation for the Environmental Impact Report on the 2050 General Plan. The NOP states that "*Anticipated growth involves amending the ULL to include **Area C and the Highway 1 Gateway** and expanding Buena Vista to Freedom Boulevard (see Attachment 5: Areas of Projected Growth within the City's Sphere of Influence).*" The map (Attachment 5: Areas of Planned Growth) shows Riverside Drive and East Lake farm sites as potential development areas.

Agriculture is a major pillar of the economic and social community of Watsonville, and the network of wetlands are a critical environmental resource. For over twenty years, the residents of the city have voted to protect these irreplaceable resources through the original Measure U that established the ULL; the defeat of Measure T which sought to amend Measure U; and the 2022 passage of Measure Q, that extended the timeframe of ULL first established by Measure U.

The Draft EIR should acknowledge the voter-approved ULL as the primary policy for growth and development. Urban growth within the ULL should be the primary focus of the Draft EIR. Growth scenarios (alternatives) that include urban expansion beyond the approved ULL need to be identified as inconsistent with city voter-adopted policy and County of Santa Cruz policies for protecting commercial agricultural lands.

Any scenario that proposes development of agricultural lands should identify its impact as an unavoidable adverse impact for the irreversible loss of quality farmland. The Draft EIR should discuss the value and purpose of protecting and valuing farmlands and wetlands, as opposed to viewing these prime farm sites as just areas reserved for projected urban growth.

Best Regards,

Dawn Reis, Chairperson
Planning and Conservation Committee



PAJARO VALLEY WATER MANAGEMENT AGENCY

36 BRENNAN STREET • WATSONVILLE, CA 95076

TEL: (831) 722-9292 FAX: (831) 722-3139

email: info@pvwater.org • <https://www.pvwater.org>

October 11, 2024

Justin Meek, AICP
Assistant Community Development Director
City of Watsonville
250 Main Street
Watsonville, CA 95076

SUBJECT: Comments on Scope and Content of the Watsonville 2050 General Plan EIR

Dear Mr. Meek,

Thank you for the opportunity to comment on the City of Watsonville's ("City") 2050 General Plan EIR. Varying uses of land within the City, and throughout the greater Pajaro Valley, have a direct impact on groundwater resources within the Pajaro Valley Groundwater Basin ("Basin"), a basin that the California Department of Water Resources has deemed critically overdrafted. Careful consideration of those impacts is critical when working to effectively manage the groundwater resources of the Basin. The Pajaro Valley Water Management Agency ("PV Water") was formed with the primary purpose of managing groundwater resources and supplemental water supplies within the Basin. PV Water's objective is to manage local groundwater resources to reduce, and eventually halt, long-term overdraft and seawater intrusion while ensuring sufficient water supplies for present and anticipated needs.

PV Water recognizes the importance of updating the general plan to guide the City's future growth and development. Key elements of the plan update such as Land Use & Community Design, Public Services & Infrastructure, Environmental Resource Management, Housing, Climate Action & Adaptation, and more will shape the manner and intensity of how the City and its residents impact the Basin. To ensure the EIR adequately assesses the potential impacts of the 2050 General Plan on water resources, PV Water is providing the following comments on the scope and content:

- The projected growth of up to 5,890 new residential units and 1.725 million square feet of non-residential development will increase water demand and stress on a critically overdrafted basin. Careful consideration must be given to the impacts of this projected growth on groundwater resources already in a state of critical overdraft and suffering seawater intrusion. It is important to note that a capability of the existing wells within the City's water system to

produce additional water does not equate to the ability of the Basin to sustain increased pumping.

- The projected growth outlined above, and described in the Notice of Preparation, will result in a significant increase of impervious surface areas that could reduce recharge and increase stormwater runoff. Careful consideration of these impacts and opportunities to mitigate impacts through retention basins, permeable pavement, dry wells, swales, and other methods should be considered.
- A mandate requiring water efficient devices, technology, and infrastructure to offset additional groundwater demand should be considered as a mitigation measure for future growth and development.
- Drought tolerant landscapes and community park resources that do not require much, or any irrigation, should be considered as mitigation measures.
- Water quality impacts from additional growth of residential and non-residential development should be evaluated and mitigation measures to reduce impacts considered.
- Cumulative impacts on groundwater resources from proposed developments within the Basin should also be evaluated. They analysis should include prospective developments outside of the City limits but within the limits of the Basin including areas within the County of Santa Cruz and the County of Monterey.

Should you have any questions or would like to discuss these comments, please do not hesitate to contact me at (831) 722-9292, or lockwood@pvwater.org.

Sincerely,



Brian Lockwood
General Manager

Re: Notice of Preparation: Watsonville 2050 General Plan EIR

From Patricia Elaina <patriciaelaina@gmail.com>
Date Sun 10/13/2024 10:21 AM
To Justin Meek <justin.meek@watsonville.gov>
1 attachments (54 KB)
Outlook-yhrpncy.png;

Dear Justin,

As I mentioned in the meeting, the two main concerns of the neighbors with whom I met were the fact that the plan proposes building on agricultural land and the undeniable stress that any less than perfectly planned development places on the infrastructure. There were also concerns about the airport, as it had been so important during the last big earthquake when the roads were nonfunctional.

No one denied the need for more housing, particularly affordable housing, but there is great concern that a better type of housing be provided than the projects recently built on Adkinson Lane. Poverty does need to be punished.

Thanks for the opportunity to comment on this, wherever it may have come from.

Patricia Fohrman
831 331 1939
Patriciaelaina@gmail.com

SC Senior Commission
Steering Committee Age Well Survey

On Fri, Sep 13, 2024, 4:50 PM Justin Meek <justin.meek@watsonville.gov> wrote:
Dear Interested Parties,

The City has released a public notice that an [Environmental Impact Report \(EIR\)](#) will be prepared for the [Watsonville 2050 General Plan](#). The purpose of the EIR is to address the potential physical effects of anticipated future development on the environment for each of the environmental topics outlined in the CEQA Guidelines. In accordance with the CEQA Guidelines section 15082, the City has requested that [responsible agencies](#) provide comments on the scope and content of the project's environmental information that is

germane to their statutory responsibilities.

For further information, including submitting comments by October 14 and attending an EIR scoping meeting on October 9, please [click here to download a copy of the Notice of Preparation](#).

Best,
Justin Meek, AICP





October 14, 2024

Justin Meek
City of Watsonville
250 Main Street
Watsonville, CA 95076

RE: Notice of Preparation – Watsonville 2050 General Plan Environmental Impact Report

Dear Mr. Meek:

Monterey-Salinas Transit District (MST) provides public transportation throughout Monterey County and provides daily commuter services to the City of Watsonville. MST is happy to see the City advancing the General Plan and we look forward to being a community partner that will support the City's vision of complete streets, rail, and a downtown multi-modal hub.

A comprehensive update of the General Plan can significantly impact the design and future development of the City and the quality of life of residents. Therefore, it is crucial that the Environmental Impact Report (EIR) study find the appropriate mitigation measures to address environmental impacts related to the Plans. MST recommends addressing significant impacts pertaining to the Transportation/Circulation and Land Use and Planning EIR chapters.

MST Existing Services and Ridership

There is a strong commute pattern between the City of Watsonville and City of Salinas. MST experiences a daily average of 89 passenger boardings at the Watsonville Transit Plaza. MST operates a daily service between Salinas and Watsonville with Lines 28 (via Castroville) and 29 (via Prunedale). Lines 28 and 29 have a combined hourly frequency between 5:45 AM-7:35 PM. Residents of Watsonville can board MST services at the following locations:

- W Riverside Dr / Sakata Ln
- Rodriguez / First
- Main / Riverside
- Rodriguez / Second

For more information regarding MST's routes and services, please visit MST's website at: <https://mst.org/maps-schedules/route-list/>. MST recommends that the EIR include a map of MST's routes and bus stops under the transportation chapter.

Advocating and delivering quality public transportation as a leader within our community and industry.

Transit District Members Monterey County • Carmel-by-the-Sea • Del Rey Oaks • Gonzales • Greenfield • King City • Marina • Monterey
Pacific Grove • Salinas • Sand City • Seaside • Soledad **Administrative Offices** 19 Upper Ragsdale Drive, Suite 200 Monterey, CA 93940

PH 1-888-MST-BUS1 (1-888-678-2871) • FAX (831) 899-3954 • WEB mst.org

Transportation/Circulation

The City of Watsonville has a transit dependent population; therefore, it is crucial that the City's General Plan include policies that support transit and active modes of transportation. Transit-dependent individuals are most likely to walk or ride to bus stops/facilities. Over 85% of MST passengers walk, bike or scooter to access the bus. MST encourages the City of Watsonville to consider pedestrian infrastructure improvements along major transportation corridors to incentivize transit use and active transportation. To mitigate the potential significant impacts related to transportation, MST recommends the use of Transportation Demand Management (TDM) measures. TDM strategies play a crucial role in the success of Transit Oriented Development and Greenhouse Gas (GHG) reduction. Some TDM strategies housing developments can implement are on-site bike amenities and transit pass subsidies. Please access MST's Transit-oriented Development (TOD) Planning¹ study to learn more about TDM policies and programs.

Land-Use and Planning

Land-use policies can significantly enhance public transportation. MST recommends that the General Plan include goals/policies that support infill and transit-oriented development to mitigate the potential negative land-use effects identified in the EIR. As part of a recent regional planning effort, MST led a TOD Planning Study. The study identifies land use policies and first-/last mile transportation strategies to support TOD opportunities, increase transit ridership potential, and reduce vehicle-miles traveled and GHG emissions. MST recommends the City of Watsonville use the TOD Planning Study as a resource to access TOD opportunity sites throughout Watsonville that have access to existing transit services and facilities.

Closing

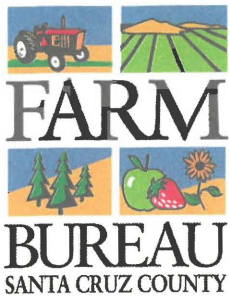
MST would like to thank the City of Watsonville for the opportunity to comment. As the General Plan process moves forward, we ask that the City of Watsonville continue to collaborate with MST to ensure If you have any questions about the above comments, please do not hesitate to contact me at epatel@mst.org or 831-264-9288.

Sincerely,



Emma Patel
Planning Manager

¹ https://mst.org/wp-content/media/20240417-MST-TOD-Implementation-Strategy-Report_clean.pdf



141 MONTE VISTA AVENUE, WATSONVILLE, CA 95076
P: (831) 724-1356 F: (831) 724-5821
sccfb@sbcglobal.net
www.sccfb.com

October 14, 2024

Justin Meek, Principal Planner
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: NOP Comments for 2050 General Plan EIR

Dear Justin,

The City's Notice of Preparation for the Environmental Impact Report on the 2050 General Plan states that "*Anticipated growth involves amending the ULL to include **Area C and the Highway 1 Gateway** and expanding Buena Vista to Freedom Boulevard (see Attachment 5: Areas of Projected Growth within the City's Sphere of Influence).*" The map (Attachment 5: Areas of Planned Growth) shows Riverside Drive and East Lake farm sites as potential development areas.

Building houses on prime farmland is not the vision that Watsonville residents want or expect from a General Plan. Three times since 2002, voters have rejected the expansion of urban development out onto world class food-producing soils, that only exist on 2% of the earth. There continue to exist many vacant and under-utilized sites within the ULL boundary, and building up instead of out is the strategy that voters approved and the city should be looking at for future "*anticipated growth*".

An ULL is a planning tool enacted by voters, not a line to be broken. Developing our 2050 General Plan needs to reflect and embrace this history, this unique location and the quality of our farmlands and wetlands as we go into the future. It is important that the EIR embodies the intentions of the people who live and vote in the city. The Draft EIR should include a robust discussion of the opportunities and restrictions of the Urban Limit Line (ULL) as adopted by city voters in the passage of Measure Q in 2022. Discussion of anticipated growth on prime farmland would be identified as an Unavoidable Adverse Impact, and would include a thorough analysis of Alternatives.

In summary, the ULL should not be amended because the voters overwhelmingly passed Measure Q in 2022. Therefore, it will expire in 2040, so there is time within the 2050 General Plan in which changes could occur - it should not be done prior to that.

Sincerely,

Dennis Webb,
President

California Department of Transportation

CALTRANS DISTRICT 5
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415
(805) 549-3101 | FAX (805) 549-3329 TTY 711
www.dot.ca.gov



October 15, 2024

SCR/Var
SCH#2024090440

Justin Meek, Assistant Director
City of Watsonville
Community Development Department
250 Main Street
Watsonville, CA 95076

RE: Watsonville 2050 General Plan Environmental Impact Report Notice of Preparation (NOP)

Dear Mr. Meek:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Watsonville 2050 General Plan Environmental Impact Report. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and State planning priorities.

Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans provides the following comments:

Traffic Impact Studies

- New developments resulting from the general plan update should provide a Vehicle Miles Traveled (VMT) based Traffic Impact Study (TIS). Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.

- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.
- Any improvements within Caltrans' Right-of-Way (R/W) from future development projects will be required to comply with Caltrans Highway Design Manual guidelines and standards.
- Any pedestrian facility enhancements from future housing development projects that are within Caltrans' R/W will need to comply with Caltrans Design Information Bulletin (DIB) 82-06.

Complete Streets and Mobility Network

- Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Mobility Hub facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, ramp improvements, or other enhancements that promote a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Watsonville is encouraged.
- To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City Watsonville to evaluate potential Complete Streets projects.

Equitable Access

- If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Land Use and Smart Growth

- Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local VMT and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation

system integrated through applicable "smart growth" type land use planning and policies. The City of Watsonville should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required if they are being destroyed by any construction. Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Climate Adaptation

- Climate change's impact on the State Highway System (SHS) and local roadways should be addressed given the forecasted regional increase in wildfires, precipitation, and storm surge. The SHS is the backbone of most county-level evacuation plans and often provides the only high-capacity evacuation routes from communities. Further, the SHS serves as the main access routes for emergency responders, and may serve as a physical line of defense such as a firebreak or an embankment against floodwaters, etc.

Thank you for the opportunity to review and comment on the proposed project. If you have any questions or need further clarification on the items discussed above, please contact me at (805) 835-6543 or email Jacob.m.Hernandez@dot.ca.gov.

Sincerely,



Jacob Hernandez
Transportation Planner
District 5 Local Development Review Coordinator



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION

1101 Pacific Avenue, Suite 250, Santa Cruz, CA 95060-4418 • (831)460-3200 • info@sccrtc.org

Justin Meek
City of Watsonville Community Development Department
250 Main Street
Watsonville, CA 95076

RE: Notice of Preparation: Watsonville 2050 General Plan EIR

Dear Mr. Meek,

Thank you for sharing the Notice of Preparation for the Watsonville 2050 General Plan EIR. On behalf of the Santa Cruz County Regional Transportation Commission (RTC), we appreciate your efforts to align this plan with the city's vision and community priorities. The improvements outlined have the potential to enhance transportation safety and increase transit use, which can help reduce vehicle miles traveled (VMT).

The RTC supports Watsonville's goal of creating complete streets while preserving natural open spaces, trails, and parks, especially in areas with higher housing density and economic activity. This approach aligns with Goal #1 of the 2045 Regional Transportation Plan (RTP), which aims to foster livable communities that improve access to jobs, schools, and recreational opportunities. By focusing on this goal, we can improve health outcomes and reduce pollution, fulfilling Target 1.B.2, which aims to decrease per capita greenhouse gas emissions. In addition, Complete Streets designs can mitigate user conflicts and support Target 2.1 of the RTP, which focuses on improving transportation safety for our most vulnerable users.

One notable project that the RTC is undertaking, which the City of Watsonville should consider in planning for complete streets and safety improvements, is the Santa Cruz County Rural Highway Safety Action Plan (RHSP). This project aims to enhance safety for all users of the County's six conventional highways, including Highways 129 and 152 outside the City of Watsonville's limits. Since these highways function as main streets, intercommunity connectors, and rural routes, any developments along them and improvements made within the city could directly benefit this project and its users. The RTC would like to coordinate with the City of Watsonville on these efforts.

We recommend establishing safe and efficient connections between existing housing, economic centers, and new infill developments. As the city expands outward, there are opportunities to implement Policy 1.1 of the RTP, which encourages the expansion of Transportation Demand Management (TDM) programs. These programs can help reduce VMT and encourage shifts to sustainable transportation modes. By integrating TDM strategies, we can enhance the current transportation network and ensure that new developments support

sustainable choices for residents, employees, and visitors. RTC staff are available to assist Watsonville in developing TDM strategies, policies, and programs as needed.

Lastly, after attending the EIR scoping meeting on October 9th, we want to emphasize the importance of addressing transportation impacts in the EIR, particularly for our most vulnerable populations. We frequently hear from elderly and disabled community members and individuals using mobility devices about the challenges and safety risks they face when navigating construction zones and obstacles in the right-of-way. The RTC encourages the City to prioritize pedestrian and bicycle safety in its plans.

In closing, we appreciate the opportunity to provide feedback on the 2050 General Plan EIR and look to further discussions. Please feel free to reach out to Grace Blakeslee (gblakeslee@scrtc.org) if you have any questions or need additional support in achieving your transportation goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "Luis Mendez". The signature is fluid and cursive, with the first name "Luis" and last name "Mendez" clearly distinguishable.

Luis Mendez
Deputy Director

Watsonville 2050 General Plan DEIR - SCH No. 2024090440

From Zachariasen, Judith@DOC <Judith.Zachariasen@conservation.ca.gov>

Date Thu 10/24/2024 1:54 PM

To General Plan <general.plan@watsonville.gov>

Cc OLRA@DOC <OLRA@conservation.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Dear Justin Meek,

The California Geological Survey (CGS) has received the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Watsonville 2025 General Plan Project. This email conveys the following recommendations from CGS concerning geologic issues related to the project area:

1. Ground Shaking and Surface Fault Rupture Hazards

The area of influence for the 2050 General Plan is traversed by the Holocene-active Zayante-Vergeles fault zone, an extent of which has been included by CGS within an Alquist-Priolo (A-P) Earthquake Fault Zone of Required Investigation. Although the A-P zone is not within a "Area of Projected Growth" as defined in Attachment 5 of the NOP, the DEIR should consider the hazard of surface fault rupture in the entire sphere of influence. In addition, the proximity of the city to additional active faults located to the east and west, including the San Andreas and San Gregorio-Hosgri faults, indicates that the site could be subject to significant ground shaking during the life of the project. The DEIR and supporting documents should address these hazards as they relate to the project components and design of any proposed developments.

Additional information about ground shaking hazard can be obtained at the following sites:

[https://usgs.maps.arcgis.com/apps/webappviewer/index.html?](https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=14d2f75c7c4f4619936dac0d14e1e468)

[id=14d2f75c7c4f4619936dac0d14e1e468](https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=14d2f75c7c4f4619936dac0d14e1e468)

<https://earthquake.usgs.gov/scenarios/catalog/bssc2014/>

-

Additional information about surface faults can be obtained at the following site:

<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>

-

2. Landslide and Liquefaction Hazards

CGS has not yet evaluated the area around the City of Watsonville for liquefaction and landslide hazards. Therefore, the absence of CGS-mapped Zones of Required Investigation does not indicate the absence of a hazard. The DEIR should address these hazards as they relate to the project components and design of any proposed developments.

If you have any additional comments or questions, please feel free to call or email.

Thank you,
Judy Zachariasen



Judith Zachariasen, PhD, PG, CEG

Senior Engineering Geologist

Fault Zoning Unit Supervisor

Seismic Hazards Program

California Geological Survey

California Department of Conservation

715 P Street, MS 1900, Sacramento, CA 95814

T: (916) 879-2844

E: judith.zachariasen@conservation.ca.gov

FW: WAAC EIR Considerations

From Rayvon Williams <rayvon.williams@watsonville.gov>

Date Mon 10/28/2024 11:02 AM

To Justin Meek <justin.meek@watsonville.gov>

Cc Tamara Vides <tamara.vides@watsonville.gov>

Justin....please see below.

Please consider this email as a formal request from Municipal Airport management to include the below noted considerations as part of the EIR effort.



From: Scott Randolph <scott@randolphs.net>

Sent: Friday, October 25, 2024 11:21 PM

To: Rayvon Williams <rayvon.williams@watsonville.gov>

Cc: WAAC <waac@cityofwatsonville.org>

Subject: WAAC EIR Considerations

Per our last meeting, the WAAC would suggest the airport request that the EIR scope include the following considerations:

- * Ensure the EIR options considered are consistent with ALUCP requirements
- * Alternatives to runway closure with consideration for safety for those on the ground as well as the flying public, including normal and fog impacted operations when the 02 runway end is obscured.
- * Impact and alternatives to encroachment of dense housing in the airport area, including consideration of sky diving and IFR operations, missed approaches, training and noise sensitivity.
- * Would there be public safety impacts or limitations on disaster response associated with elimination of 9/27?

Additionally, the board noted these concerns for the overall plan:

- * Fire concerns in the Buena Vista area
- * Emissions and increased traffic associated with densification in Buena Vista
- * Water availability for housing in Buena Vista and in general for the above target growth numbers called for in the draft general plan.

Yours,

Scott Randolph
WAAC Chair

Re: Reissued Notice of Preparation: Watsonville 2050 General Plan EIR

From Rayvon Williams <rayvon.williams@watsonville.gov>

Date Thu 1/30/2025 10:12 AM

To Justin Meek <justin.meek@watsonville.gov>

Cc Glen Ceresa <glen.ceresa@gmail.com>; Theresa Byers <186terryloop@gmail.com>; Dave Guerrieri <dave@calibroaviation.com>; Larry Lease <llease@alleasecompany.com>; Mercedes Eulitt <rv6mercedes@yahoo.com>; Scott Randolph <scott@randolphs.net>; Thomas Dienwiebel <thomas@dienwiebel.com>; Alexandra Aguado <alexandra.aguado@watsonville.gov>; Sam Rosas <sam.rosas@watsonville.gov>

Good morning, Justin...during last night's WAAC meeting there was a discussion regarding the reissued Notice below. This email serves, similarly, to our request last October as an airport specific request.

The WAAC is once again requesting, and per this email the airport is supportive, a formal ask to include the following considerations:

- * Ensure the WAAC that the EIR options considered are consistent with ALUCP requirements
- * Alternatives to runway closure with consideration for safety for those on the ground as well as the flying public, including normal and fog impacted operations when the 02 runway end is obscured.
- * Impact and alternatives to encroachment of dense housing in the airport area, including consideration of sky diving and IFR operations, missed approaches, training and noise sensitivity.
- * Would there be public safety impacts or limitations on disaster response associated with elimination of 9/27?

Regarding the above it's also the airport's request that a confirmation of receipt and an indication of how these considerations are included and if not, why not.

Additionally, the WAAC noted these concerns for the overall plan:

- * Fire concerns in the Buena Vista area
- * Emissions and increased traffic associated with densification in Buena Vista
- * Water availability for housing in Buena Vista and in general for the above target growth numbers called for in the draft general plan.

Thanks...and if you have any questions please reach out to us.



**Rayvon
Williams**

watsonville.gov



Watsonville

COMMUNITY DEVELOPMENT

Airport Director

From: Justin Meek <justin.meek@watsonville.gov>

Sent: Friday, January 24, 2025 4:30 PM

Cc: General Plan <general.plan@watsonville.gov>

Subject: Reissued Notice of Preparation: Watsonville 2050 General Plan EIR

Dear Interested Parties,

The City has released a public notice last September that an Environmental Impact Report (EIR) will be prepared for the [Watsonville 2050 General Plan](#). The purpose of the EIR is to address the potential physical environmental effects of the anticipated future development on the environment for each of the environmental topics outlined in the CEQA Guidelines.

Since that time, approximately 55 acres of land was added to the Highway 1 Gateway area for possible annexation and future non-residential development. Given this, the City is reissuing the notice to solicit comments from responsible agencies on the scope and content of the project's environmental information that is germane to their statutory responsibilities.

For further information, including submitting comments by February 24 and attending a virtual EIR scoping meeting on February 18 at 1 PM, please [click here to download a copy of the revised Notice of Preparation](#).

Best,

Justin Meek, AICP



**Justin
Meek, AICP**

watsonville.gov



Watsonville

COMMUNITY DEVELOPMENT

Interim Community
Development Director



NATIVE AMERICAN HERITAGE COMMISSION

February 4, 2025

Justin Meek
City of Watsonville, Community Development Department
250 Main Street
Watsonville CA 95076

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
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COMMISSIONER
Laurena Bolden
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COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

ACTING EXECUTIVE
SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2024090440 Watsonville 2050 General Plan Environmental Impact Report Project, Santa Cruz County

Dear Mr. Meek:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Bay Delta Region
 2825 Cordelia Road, Suite 100
 Fairfield, CA 94534
 (707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 18, 2025

Justin Meek
 City of Watsonville, Community Development Department
 250 Main Street
 Watsonville, CA 95076
Justin.Meek@watsonville.gov

Subject: Watsonville 2050 General Plan Environmental Impact Report, Notice of Preparation of a Draft Environmental Impact Report. SCH No. 2024090440, City of Watsonville, Santa Cruz County

Dear Justin Meek:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Watsonville (City) reissued Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the Watsonville 2050 General Plan Environmental Impact Report (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously commented on the original NOP (original NOP) released for the Project on September 13, 2024, for public comment through October 14, 2024.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City of Watsonville, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.). For purposes of CEQA, CDFW

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any Project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA permit.

CEQA requires a mandatory finding of significance if a Project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a Project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires a LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct

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the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: City of Watsonville

Objective: Since the release of the original NOP for the Project approximately 55 acres of land was added to the Highway 1 Gateway area for possible annexation and future non-residential development. The total number of residential units remain unchanged in this revised version of the 2050 General Plan, although slight adjustments were made to their distribution within the existing City limits and designated growth areas. No other changes have been made to the Project.

Location: The Project encompasses the City of Watsonville including five areas on noncontiguous land at the Watsonville Wastewater Treatment Plant, Buena Vista Landfill, Pinto Lake, Corralitos Water Filter Plant, and Browns Valley in Santa Cruz County.

Timeframe: 2050.

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental

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impact. Please include a complete description of the following Project components in the Project description including, but not limited to, the below information.

- Identification of impacts to connectivity areas, permeability, and natural landscape areas (e.g., California Essential Habitat Connectivity Project, State Wildlife Action Plan, Regional Advance Mitigation Plan, Areas of Conservation Emphasis, Restoring California's Wildlife Connectivity 2022, other relevant plans, policies, and ordinances adopted by neighboring jurisdictions, and regional wildlife connectivity assessments).
- Location of existing wildlife movement pathways and built infrastructure supporting wildlife movement, including data on wildlife movement, if applicable.
- Potential for obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.
- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%2>

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[Ocommunities](#)), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to: the species listed in **Attachment 1**.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the City adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at:

<https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Changes in hydrological conditions that could alter the timing and magnitude of streamflows both during construction and operation of the Project;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);

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- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence;
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features;
- Water quality impacts resulting from construction and operation of the Project;
- Impacts both from construction and operation of the Project;
- Impacts to the bed, channel, and bank, in the reservoirs and creeks downstream of the Project; and
- Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat.

The CEQA document also should identify existing and reasonably foreseeable future Projects in the Project vicinity, disclose any cumulative impacts associated with these Projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a Project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City of Watsonville, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

COMMENTS AND RECOMMENDATIONS

Based on the information provided in the NOP, CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and/or indirect impacts on fish and wildlife (biological) resources. These comments and recommendations are not an exhaustive list and CDFW may provide additional recommendations as more Project

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specific information is disclosed. The draft EIR must include a full Project Description, Environmental Setting, and Impact Analysis and Mitigation Measures as outlined above. Editorial comments or other suggestions may also be included to improve the document.

General Conservation Planning Comment: CDFW appreciates the 2050 General Plan will broadly include preserving the City's natural open spaces, especially the sloughs. While CDFW encourages and supports these goals, the Project has potential to significantly impact biological resources from Project related habitat loss in areas outside of open space and sloughs. Remaining riparian habitat along streams and tributaries to major sloughs and wetlands as well as uplands in the Project areas may provide important habitat and allow movement (connectivity) for a variety of special-status fish and wildlife species.

COMMENT 1: Artificial Lighting

Issue: The Project has the potential to increase artificial lighting from addition to residential and nonresidential development along East Lake Avenue and Freedom Boulevard corridors and within Downtown Watsonville, Buena Vista, Atkinson Lane, Area C, and the Highway 1 Gateway area. Artificial lighting has the potential to significantly and adversely affect fish and wildlife behavior and reproduction.

Evidence impact would be significant: Several studies show that direct and indirect light effects the physiology, behavior and life history of animals, with consequences for their development, survival, and reproductive success (Candolin and Filippini, 2025). Night lighting can disrupt the circadian rhythms of wildlife species. Many species use photoperiod cues for communication such as bird song (Miller, 2006), determining when to begin foraging (Stone et al., 2009), behavior thermoregulation (Beiswenger, 1977), and migration (Longcore and Rich, 2004). Changes in how animals behave, survive, and reproduce can affect their population sizes and where they live. This, in turn, impacts biodiversity, how species interact, and essential ecosystem processes like nutrient cycling, pollination, and seed dispersal (Candolin and Filippini, 2025).

Recommendation 1: CDFW recommends eliminating all non-essential artificial lighting. If artificial lighting is necessary, CDFW recommends avoiding or limiting the use of artificial lights during the hours of dawn and dusk, when many wildlife species are most active. CDFW also recommends that outdoor lighting be shielded, cast downward, and does not spill over onto other properties or upwards into the night sky (see the International Dark-Sky Association standards at <https://darksky.org/>) and limited to warm light colors with an output temperature of 2700 kelvin or less.

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COMMENT 2: Impervious Surface Runoff

Issue: The Project could increase impervious surfaces at the Project site with the addition of roads, residential buildings, and non-residential buildings. Impervious surfaces, stormwater systems, and storm drain outfalls have the potential to significantly affect fish and wildlife resources by altering the hydrograph of natural streamflow patterns via concentrated run-off.

Evidence impact could be significant: Urbanization (e.g., impervious surfaces, stormwater systems, storm drain outfalls) can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows (Hollis 1975, Konrad and Booth 2005). Increased impervious cover leads to greater stormwater runoff and reduced groundwater recharge. This excess runoff raises stream flows during storms, causing erosion of stream banks, increased sedimentation, and the degradation of aquatic habitats (Chithra et al., 2015).

Recommendation 1: CDFW recommends that storm runoff be dispersed rather than concentrated to a stormwater outfall or other receiving waters. CDFW recommends implementation of Low Impact Development (LID) and the use of bioswales and bioretention features to intercept storm runoff. CDFW also recommends incorporating permeable surfaces throughout the Project to allow stormwater to percolate in the ground and prevent stream hydromodification (see for example: Evaluating the potential benefits of permeable pavement on the quantity and quality of stormwater runoff, <https://www.usgs.gov/centers/upper-midwest-water-science-center/science/evaluating-potential-benefits-permeable-pavement>).

COMMENT 3: Riparian Setbacks

Issue: The Project has the potential to encroach into riparian vegetation (i.e., “riparian zone”) from development. Encroachment into the riparian zone can result in significant and adverse impacts to sensitive riparian and aquatic species through reduction of habitat and decreased water quality. Riparian zone encroachment also has the potential to increase flood risk in areas bordering the creek and accelerate erosion. Streambank stabilization activities are commonly needed in areas of riparian encroachment resulting in cumulative impacts over time.

Evidence impact would be significant: Riparian vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat, including thermal protection, cover, and large woody debris (Moyle 2002, CDFW 2007). Development adjacent to the riparian zone can result in fragmentation of riparian habitat and decreases in native species abundance and biodiversity (Davies et al. 2001, Hansen et al. 2005, CDFW 2007). Riparian buffers help keep pollutants from entering adjacent waters through a combination of processes including dilution, sequestration by

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plants and microbes, biodegradation, chemical degradation, volatilization, and entrapment within soil particles. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brososke et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Mitigation Measure 1: CDFW recommends the Project establish and the draft EIR incorporate riparian buffer zones along all rivers, lakes and streams to prohibit development and vegetation clearing to outside of and away from riparian areas. Riparian buffers should include all perennial, intermittent and ephemeral streams. CDFW is available to consult with the City to determine appropriate riparian buffers to reduce impacts to special-status species and riparian habitat to less-than-significant.

COMMENT 4: Santa Cruz Tarplant

Issue: The Project has the potential to significantly impact Santa Cruz tarplant (*Holocarpha macradenia*) with the development of new residential units and non-residential units in the new Urban Limit Line (ULL) in Buena Vista Area.

Evidence the impact would be significant: Santa Cruz tarplant is an endangered species under CESA (Fish & G. Code, § 2050 et seq.). Species listed under CESA may not be taken² at any time except under the provisions of a Natural Communities Conservation Plan (NCCP), (Fish & G Code § 2081.7), a Memorandum of Understanding (MOU) for scientific education or management purposes (Fish & G. Code §2081, subd. (a)), or an ITP (Fish & G. Code § 2081 (b)).

Santa Cruz tarplant is an annual species and the number of individuals recorded in a year is highly dependent on rainfall and other factors. Santa Cruz tarplant produces two types of seeds, ray achenes and disk achenes (USFWS 2014). Generally, the seeds fall within the vicinity of the plant and do not have a structural means for dispersal, although it is possible that some ray achenes may be dispersed long distances by animals (USWFS 2014). Ray achenes also form lasting seed banks with seeds that remain viable for an unknown amount of time, with seeds up to 15 years old successfully germinating (USFWS 2014). Surveys over consecutive seasons may be necessary to increase the likelihood of detection and account for variances in weather and other disturbances from year to year to determine the potential for take.

Recommended Mitigation Measure 2 – Focused Survey: Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping, an experienced botanist, familiar with the native plant communities of Santa Cruz County shall conduct a focused Santa Cruz tarplant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire Project

² Take is defined in Fish & G. Code, § 86 as hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

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where potential Santa Cruz tarplant habitat has been identified, prior to the initiation of construction and the results shall be included in the Project environmental document. Surveys shall be conducted according to: Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (CDFW 2018), available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

Recommended Mitigation Measure 3 – Santa Cruz Tarplant Avoidance and

Mitigation: If Santa Cruz tarplant is detected or likely to occur within the Project area, additional measures may be needed to avoid, minimize, and/or mitigate potential Project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the Project proponent shall obtain an ITP pursuant to Fish and Game Code section 2081, subdivision (b) (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9). Information on the ITP process is available at <https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>. In addition, CDFW recommends continued coordination to develop additional measures.

COMMENT 5: Tricolored Blackbird

Issue: Tricolored blackbirds (*Agelaius tricolor*) have the potential to occur within or near the Project site with the development of new residential units and non-residential units in the ULL and tricolored blackbird have been documented to occur near the Project area at the Highway 1 Gateway Area (CNDDDB, 2011 & 2014). Without appropriate avoidance and minimization measures for tricolored blackbirds, potential significant impacts include nest and/or colony abandonment, reduced reproductive success, and reduced health and vigor of eggs and/or young.

Evidence impact would be significant: Tricolored blackbirds aggregate and nest colonially, forming colonies of up to 100,000 nests (Meese et al. 2014). Increasingly, tricolored blackbirds are forming larger colonies that contain progressively larger proportions of the species' total population (Kelsey 2008). In 2008, for example, 55 percent of the species' global population nested in only two colonies, which were located in silage fields (Kelsey 2008). In 2017, approximately 30,000 tricolored blackbirds were distributed among only 16 colonies in Merced County (Meese 2017). Nesting can occur synchronously, with all eggs laid within one week (Orians 1961). For these reasons, depending on timing, disturbance to nesting colonies can cause abandonment, significantly impacting tricolored blackbirds populations (Meese et al. 2014)

Recommended Mitigation Measure 4 – Tricolored Blackbird Habitat Assessment:

CDFW recommends that a qualified biologist conduct a habitat assessment of the Project site in advance of Project implementation, to determine if the Project site or its vicinity contains suitable habitat for tricolored blackbirds.

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Recommended Mitigation Measure 5 - Tricolored Blackbird Surveys: CDFW recommends that Project activities be timed to avoid the typical bird breeding season (February 1 through September 15). However, if Project activities must take place during that time, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting tricolored blackbirds no more than 10 days prior to the start of implementation to evaluate presence/absence of tricolored blackbirds nesting colonies in proximity to Project activities and to evaluate potential Project-related impacts.

Recommended Mitigation Measure 6 – Tricolored Blackbird Avoidance and Mitigation: If an active tricolored blackbirds nesting colony is found during pre-activity surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer in accordance with CDFW's "*Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015*", <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=99310&inline> (CDFW 2015b). CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival. It is important to note that tricolored blackbirds colonies can expand over time and for this reason, the colony may need to be reassessed to determine the extent of the breeding colony within 10 days prior to Project initiation. In the event that a tricolored blackbirds nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code Section 2081(b), prior to any ground-disturbing activities.

COMMENT 6: California Red-Legged Frog

Issue: California red-legged frog (*Rana draytonii*) primarily inhabit ponds but can also be found in other waterways including marshes, streams, and lagoons, and the species will also breed in ephemeral waters (Thomson et al. 2016). The Project site contains habitat and California red-legged frog have the potential to occur in the vicinity of the Project site. Avoidance and minimization measures are necessary to reduce impacts to California red-legged frog to a level that is less-than-significant. Without appropriate avoidance and minimization measures for California red-legged frog, potentially significant impacts associated with the Project's activities include burrow collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, and direct mortality of individuals.

Evidence impact would be significant: California red-legged frog populations throughout the State have experienced ongoing and drastic declines and many have been extirpated. Habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control,

Justun Meek, Interim Community Development Director
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degraded water quality, and introduced predators, such as bullfrogs are the primary threats to California red-legged frog (Thomson et al. 2016, USFWS 2017).

Recommended Mitigation Measure 7 – California Red-Legged Frog Surveys:

CDFW recommends that a qualified wildlife biologist conduct surveys for California red-legged frog in accordance with the USFWS “*Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog*,” <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83914&inline>” (USFWS 2005) to determine if California red-legged frog are within or adjacent to the Project area.

Recommended Mitigation Measure 8 – California Red-Legged Frog Avoidance: If any California red-legged frog are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when California red-legged frog are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for California red-legged frog.

COMMENT 7: State Fully Protected Species within the Project Area

Issue: Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*) is a fully protected species that have the potential to occur within and in the vicinity the Project area.

Fully protected species, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.

Recommendation to minimize significant impacts: CDFW recommends that the Project completely avoid impacts to fully protected species.

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ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (See Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP in order to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alexis Harrison, Environmental Scientist at (707) 815-2779 or Alexis.Harrison@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:

B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

Justun Meek, Interim Community Development Director
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ATTACHMENT 1: Special-Status Species from the CNDDDB within a 5-mile Radius of the Project Site

Scientific Name	Common Name	Status
	Amphibians	
<i>Ambystoma californiense</i> pop. 1	California giant salamander	FT, ST
<i>Ambystoma macrodactylum croceum</i>	Santa Cruz long-toed salamander	FT, FP
<i>Aneides niger</i>	Santa Cruz black salamander	SSC
<i>Rana boylei</i> pop. 4	foothill yellow-legged frog - central coast DPS	FT, SE
<i>Rana draytonii</i>	California red-legged frog	FT
	Birds	
<i>Agelaius tricolor</i>	Tricolored blackbird	ST
<i>Charadrius nivosus nivosus</i>	Western snowy plover	FT, SCC
<i>Riparia riparia</i>	Bank swallow	ST
	Fish	
<i>Eucyclogobius newberryi</i>	Tidewater goby	FT
	Mammals	
<i>Taxidea taxus</i>	American badger	SSC
	Plants	
<i>Arctostaphylos hookeri</i> ssp. <i>hookeri</i>	Anderson's manzanita	CRPR 1B.2
<i>Arctostaphylos hookeri</i> ssp. <i>Hookeri</i>	Hooker's manzanita	CRPR 1B.2
<i>Arctostaphylos pajaroensis</i>	Pajaro manzanita	CRPR 1B.2
<i>Centromadia parryi</i> ssp. <i>congdonii</i>	Congdon's tarplant	CRPR 1B.1
<i>Chorizanthe pungens</i> var. <i>pungens</i>	Monterey spineflower	FT, CRPR 1B.2
<i>Chorizanthe robusta</i> var. <i>robusta</i>	robust spineflower	FT, CRPR 1B.1

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<i>Holocarpha macradenia</i>	Santa Cruz tarplant	FE, CRPR 1B.1
<i>Plagiobothrys diffusus</i>	San Francisco popcornflower	CRPR 1B.2
	Reptiles	
<i>Anniella pulchra</i>	Northern California legless lizard	SSC
<i>Emys marmorata pallida</i>	Southwestern pond turtle	SSC
	Insects	
<i>Bombus crotchii</i>	Bombus crotchii	CE
<i>Danaus plexippus plexippus</i> pop. 1	monarch - California overwintering population	FC

FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; FC = candidate for federal listing under ESA; SE = state listed as endangered under CESA; ST = state listed as threatened under CESA; CE= candidate for state listing as threatened or endangered; FP = state fully protected under Fish and Game Code; SSC = state species of special concern; CRPR = California rare plant rank



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION

1101 Pacific Avenue, Suite 250, Santa Cruz, CA 95060-4418 • (831)460-3200 • info@sccrtc.org

February 20, 2025

Justin Meek
City of Watsonville Community Development Department
250 Main Street
Watsonville, CA 95076

RE: Revised Notice of Preparation – Watsonville 2050 General Plan Environmental Impact Report (EIR)

Dear Mr. Meek,

Thank you for sharing the Revised Notice of Preparation for the Watsonville 2050 General Plan EIR. The Santa Cruz County Regional Transportation Commission (RTC) previously commented on the original Notice of Preparation and stated that we appreciate your efforts to align this plan with the city's vision and community priorities. The improvements outlined have the potential to enhance transportation safety and increase transit use, which can help reduce vehicle miles traveled (VMT).

In regard to the additional 55 acres of prime agricultural land in the Highway 1 Gateway planning area, we wanted to note the overlap between this area and the existing RTC owned rail line. While there is no residential development proposed for the Gateway area, there are opportunities for access to the trail and potential future passenger rail stop at the Downtown Watsonville Station.

The RTC would like to coordinate with the City of Watsonville as plans progress to ensure proposed projects with the Gateway area along the rail line are not in conflict with the publicly owned right-of-way.

We appreciate the opportunity to provide feedback on the Revised Notice of Preparation for the Watsonville 2050 General Plan EIR and look forward to future discussions. Please feel free to reach out to Grace Blakeslee (gblakeslee@sccrtc.org) if you have any questions or need additional support in planning around the Coastal Rail Trail and passenger rail projects.

Sincerely,

Sarah Christensen
Executive Director

February 24, 2025

Justin Meek, Principal Planner
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: NOP Comments for Preparation of the General Plan EIR

Dear Justin,

I am responding to your letter of January 24, 2025, where you stated that approximately 55 acres of prime agricultural land has been added to the Highway 1 Gateway area for possible annexation and future non-residential development.

Only 2% of the planet has food-producing soils with this fertility in this Mediterranean climate. Amending the Urban Limit Line and adding this ground is not a responsible land use option, given the need for on-going and future food production in the face of increasing population and the changing climate.

City residents have repeatedly voted three times to protect this land, and this proposed action and amendment does not pay attention to the will of the people of Watsonville.

The General Plan needs to acknowledge the unique value of these lands, and that removing them from production would be an unavoidable adverse and irreversible impact.

Sincerely,

Sam Earnshaw
Committee for Planned Growth and Farmland Protection
PO Box 1766
Watsonville, CA. 95077
213 308-3748

Comment on proposed General Plan update

From Bryan Largay <Bryan.largay@landtrustsantacruz.org>

Date Mon 2/24/2025 3:54 PM

To General Plan <general.plan@watsonville.gov>

Dear Mr. Meek,

We applaud the thoughtful process that the City of Watsonville has followed to update the General Plan and provide needed housing and tax revenue for the community.

The City recently presented the proposed General Plan Update. It includes, in the Highway 1 Gateway Area, a "new growth area" that is outside the urban limit line. A portion of this area is in close proximity to an Indigenous Cemetery near Lee Road. We recommend that this area be designated for land uses other than urban development on account of the sensitive cultural resources in the area. Commercial development of this area, as potentially proposed, could potentially disturb sacred sites and human remains.

Below is the General Plan map and an aerial photograph with the vicinity circled on each in red.

A description of the cemetery and past controversy related to development in the area was described by Randall Milliken, Laurence H. Shoup, and Beverly R. Ortiz (2009). See page 227 in:

<https://npshistory.com/publications/goga/ohlone-indians.pdf>. An excerpt from that book is included below.

Thank you for considering this matter.

Kind Regards,

Bryan Largay

Conservation Director

Land Trust of Santa Cruz County

From page 227 in Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today, by Randall Milliken, Laurence H. Shoup, and Beverly R. Ortiz (2009)

Lee Road Cemetery Protection

Another example of Indian resistance to cultural site disruption in Ohlone/Costanoan country took place in Santa Cruz County in mid-1975. This was a nearly violent showdown over the desecration and destruction of an Indian cemetery on Lee Road near Watsonville. Patrick Orozco, a Pajaro Valley Ohlone, had grown up as part of a family that watched over this graveyard. His grandmother told him how his great grandfather would stop at the cemetery to pray, telling his family "Your people are there. Respect them and protect them" (Orozco and Robin 2002).

When a developer began bulldozing the burial ground for a warehouse site, Orozco and other local Indians could not prevail upon local authorities to protect the cemetery. Armed with rifles and bows and arrows, they entered the graveyard at night. They planned to physically occupy the site to prevent its further destruction, non-violently if possible (they had agreed among themselves not to shoot first), but violently if necessary (they would shoot back if fired upon). In Orozco's words: "We understood that we might lose our lives defending our religious rights, our culture, our people. When day break came, we faced a sea of law enforcement and weaponry" (Orozco and Robin 2002:99).

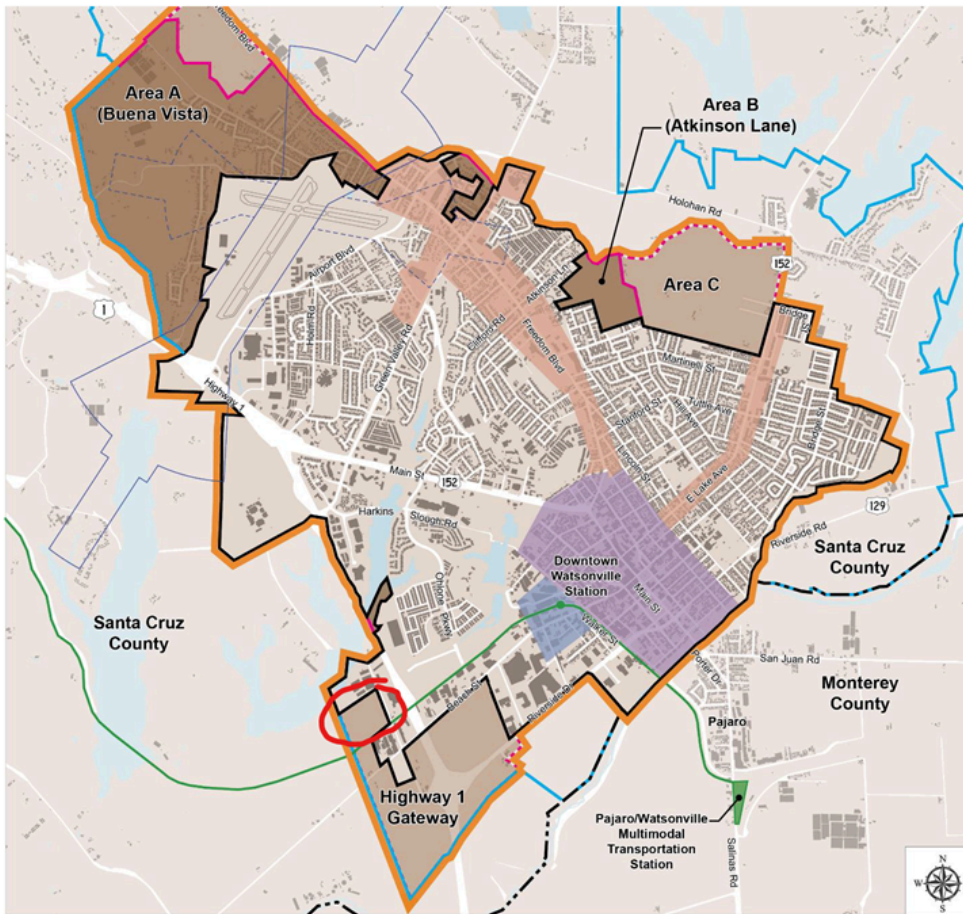
Political leaders worked out a compromise at the last minute, not wanting to face the

responsibility for killing Indians who wanted to protect ancestral graves. A settlement allowed the developer to build his warehouses on the already bulldozed half of the graveyard, and give the undamaged remaining half of the site and five acres of adjacent land to the local Ohlone/ Costanoans (Orozco and Robin 2002:100). Orozco remembered that the effort to preserve the Lee Road cemetery “opened up our eyes.”

We saw that we had a need to research our way of life and to learn what was left in

regard to our songs and dances and traditional way of life (Robin and Orozco 2002:216).

ATTACHMENT 5 – AREAS OF PROJECTED GROWTH WITHIN THE CITY’S SPHERE OF INFLUENCE



Legend

- | | | |
|-------------------------------------|-------------------------------|---|
| — City Limit | ■ Downtown Infill | --- Main Runway Airport Safety Zones 1-5 |
| --- County Boundary | ■ Station Area Infill | --- Crosswind Runway Airport Safety Zones 1-5 |
| — Plan Area | ■ Corridor Infill | — Proposed Passenger Rail Line and Station |
| — Sphere of Influence (SOI) | ■ New Growth Area within ULL | |
| — Existing Urban Limit Line (ULL) | ■ New Growth Area outside ULL | |
| --- Proposed Urban Limit Line (ULL) | | |



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February 24, 2025

Via Email: justin.meek@watsonville.gov

Justin Meek, Principal Planner
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: NOP Comments for Preparation of the General Plan EIR regarding Highway 1 Gateway Annexation

Dear Mr. Meek,

I am receipt of your letter of January 24, 2025, regarding the addition of approximately 55 acres of prime agricultural land to the Highway 1 Gateway for possible annexation and future non-residential development.

As you are aware, agriculture is not only a key pillar of Watsonville's economy but also an essential part of its cultural and social fabric. Watsonville has long been a community of immigrants who have built their livelihoods in agriculture, and any proposal that threatens farmland also threatens the very identity of our city. The residents of Watsonville have repeatedly demonstrated their commitment to protecting prime farmland, most notably by voting to establish and uphold the Urban Limit Line (ULL), first approved by voters in 2002 as Measure U and extended until 2040 through Measure Q in 2022.

The Draft Environmental Impact Report (EIR) must recognize the voter-approved ULL as the guiding policy for growth and development. Urban growth should be concentrated within the existing ULL, and any scenario that proposes expansion beyond these boundaries must be clearly identified as inconsistent with the will of Watsonville's voters and the County of Santa Cruz's policies for protecting commercial agricultural lands.

Furthermore, any proposal to develop prime agricultural land should acknowledge the irreversible loss of high-quality farmland as an unavoidable adverse impact. The Draft EIR must not merely view these lands as vacant space for projected urban expansion but should instead recognize their intrinsic value to Watsonville's economy, environment, and cultural heritage. Protecting agricultural lands is not just about preserving open space, it is about preserving the identity and economic foundation of a community that has thrived on farming for generations.

I urge you to ensure that the Draft EIR fully considers these concerns and accurately reflects the city's longstanding commitment to safeguarding agricultural land and the diverse community that depends on it.

Sincerely,

Ramon Gomez

Ramon Gomez, Former Watsonville City Council Member
PO Box 2583
Watsonville, CA 95077



Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

www.watsonvillewetlandswatch.org

“Dedicated to protecting, restoring and appreciating the wetlands of the Pajaro Valley”

February 24, 2025

Justin Meek, Interim Planning Director
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: Comments on the Revised NOP for Preparation of the General Plan EIR

Dear Mr. Meek,

Thank you for providing the public with a virtual meeting on February 18, 2025 regarding the City’s revised Notice of Preparation for the Environmental Impact Report (EIR) on the 2050 General Plan. The new NOP describes a revised project that now includes 55 acres of prime agricultural land located beyond the City’s urban limit line (ULL), named the Gateway Area, that would be proposed for annexation to the City. Our previous comment letter on the original NOP, dated October 11, 2024, is incorporated herein by reference. This letter supplements our original comments by providing additional comments pertaining to the revised project.

The Land Use and Planning section of the EIR should identify the 55-acre Gateway Area as currently designated by the County of Santa Cruz General Plan as “Agriculture” land use with an “Agricultural Resource” overlay and within the “CA” (Commercial Agriculture) zoning district. These designations are reserved for prime agricultural land that have the characteristics to support large-scale commercial crop (or livestock) production. Converting these lands to non-agricultural use would be in conflict with these designations. Annexations of these 55 acres beyond the adopted ULL would also be in conflict with the City’s ULL that was approved by the voters originally by Measure U in 2002 and reaffirmed by the voters with the passage of Measure Q in 2022. It should also be noted that an attempt to expand the ULL in the intervening years to include the Gateway Area by Measure T was soundly rejected by the City’s voters. Clearly, the sentiment of the voters is to retain the Gateway Area in agriculture.

The Agriculture and Forestry Resources section of the EIR will need to describe any conversion of the 55-acre Gateway Area as an unavoidable adverse impact. This would also generate a significant irreversible environmental change as should be described as such in the appropriate section of the EIR.

The Alternatives section of the EIR must include an alternative to avoid the unavoidable impact on agricultural resources discussed above. This alternative would describe how the City could meet its residential and commercial growth goals within the adopted ULL. The Measure Q committee (Committee for Planned Growth and Farmland Protection) prepared a Section 9212 Report that identified areas within the ULL that were available for residential and commercial development. A copy of this report was submitted to the City’s Department of Community Development. The report also discusses how several properties along arterial corridors (e.g. East Lake Ave, Freedom Blvd.) could be

rezoned and designated by a new General Plan to encourage Smart Growth mixed use projects with three and four-story heights. This type of development is already encouraged by the City's Downtown Specific Plan. Information from the 9212 Report would be a useful first step in preparing the Alternative based on the existing ULL. Please contact Jonathan Pilch, Executive Director, at (831) 728-1156 if you need an additional copy of this report.

Sincerely,

Kim Tschantz

Kim Tschantz, Vice-president
Board of Directors



Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

www.watsonvillewetlandswatch.org

"Dedicated to protecting, restoring and appreciating the wetlands of the Pajaro Valley"

October 11, 2024

Justin Meek, Principal Planner
Department of Community Development
City of Watsonville
250 Main Street
Watsonville, CA 95076

Subject: NOP Comments for Preparation of the General Plan EIR

Dear Mr. Meek,

Thank you for providing our organization with the City's Notice of Preparation for the Environmental Impact Report on the 2050 General Plan. The NOP states that "*Anticipated growth involves amending the ULL to include **Area C and the Highway 1 Gateway** and expanding Buena Vista to Freedom Boulevard (see Attachment 5: Areas of Projected Growth within the City's Sphere of Influence).*" The map (Attachment 5: Areas of Planned Growth) shows Riverside Drive and East Lake farm sites as potential development areas.

Agriculture is a major pillar of the economic and social community of Watsonville, and the network of wetlands are a critical environmental resource. For over twenty years, the residents of the city have voted to protect these irreplaceable resources through the original Measure U that established the ULL; the defeat of Measure T which sought to amend Measure U; and the 2022 passage of Measure Q, that extended the timeframe of ULL first established by Measure U.

The Draft EIR should acknowledge the voter-approved ULL as the primary policy for growth and development. Urban growth within the ULL should be the primary focus of the Draft EIR. Growth scenarios (alternatives) that include urban expansion beyond the approved ULL need to be identified as inconsistent with city voter-adopted policy and County of Santa Cruz policies for protecting commercial agricultural lands.

Any scenario that proposes development of agricultural lands should identify its impact as an unavoidable adverse impact for the irreversible loss of quality farmland. The Draft EIR should discuss the value and purpose of protecting and valuing farmlands and wetlands, as opposed to viewing these prime farm sites as just areas reserved for projected urban growth.

Best Regards,

Dawn Reis, Chairperson
Planning and Conservation Committee

Table 1 NOP Comments and EIR Response

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Santa Cruz Local Agency Formation Commission		
Joe A. Serrano	Area A (Buena Vista Area) and Area G (West of Highway 1) are located outside the City of Watsonville's sphere of influence and would be subject to LAFCO's approval. LAFCO is a Responsible Agency under CEQA.	Please see Section 2.3, Project Location of Chapter 2, Project Description , for a description of potential annexation areas. Section 9.2, Agencies Consulted of Chapter 9, Lead Agencies and Consultants , lists agencies consulted throughout the Draft EIR process. However, because General Plan 2050 is a plan for development and mobility in Watsonville and does not propose specific projects requiring permits or approvals other than adoption of General Plan 2050, additional responsible and trustee agencies may be applicable depending on the nature and location of the future development project.
Joe A. Serrano	LAFCO requests that the Draft EIR include an analysis of the EIR's conformance to the full range of LAFCO's adopted policies and related State laws, to the extent such analysis is possible based on information currently available about potential long-term future development of currently unincorporated sites. More detailed, site-specific, and updated analysis to LAFCO laws and policies should also be required for subsequent, project-level CEQA documents when future proposals are brought forward to LAFCO.	An overview of relevant laws and policies, including LAFCO's role in the plan area, are included in Subsection 4.11.1, Environmental Setting , of Chapter 4.11. Land Use and Planning of this EIR.
Joe A. Serrano	LAFCO requests that existing Extraterritorial Service Agreements (ESAs) be included in the General Plan update to reflect the current service delivery to affected parcels outside the city but within the existing sphere boundary and planning area to allow the City to plan for future annexations, if and when appropriate.	A discussion of Extraterrestrial Service Agreements is included in Subsection 4.11.1, Environmental Setting , of Chapter 4.11. Land Use and Planning of this EIR.
Joe A. Serrano	LAFCO requests that the EIR analyze General Plan 2050's consistency with the adopted 1979 County Urban Services Line (USL) and include revisions to the adopted USL and support from the County. LAFCO requests that they be consulted if modifications to the adopted USL are required.	A discussion of the 1979 Urban Services Line is included in Subsection 4.11.1, Environmental Setting , of Chapter 4.11. Land Use and Planning of this EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Joe A. Serrano	According to LAFCO records, the City of Watsonville has 17 extraterritorial service agreements in place and the letter provides maps and locations of these ESAs.	A discussion of Extraterrestrial Service Agreements is included in Subsection 4.11.1, Environmental Setting, of Chapter 4.11. Land Use and Planning of this EIR.
Pajaro Valley Water Management Agency		
Casey Meusel	Regarding the “other CEQA topics” listed – how are growth inducing impacts addressed?	Growth-inducing impacts are analyzed in Chapter 6, Growth-Inducing Impacts in full compliance with Public Resources Code Section 21100 (b) (5) and State CEQA Guidelines Section 15126.2(e).
Casey Meusel	The Pajaro Valley Water Management district will be providing a comment letter. Comments will focus on the city’s ability to provide water for development; the increase in impervious surfaces and the resultant impact on groundwater recharge; and the water quality of runoff into streams and waterways. The letter will request that mitigation measures be recommended.	A comment letter was received from the Pajaro Valley Water Management Agency. Responses to the comment letter are provided below in response to Brian Lockwood.
Casey Meusel	Why has Buena Vista not been developed yet? Many Buena Vista area residents oppose annexation.	Buena Vista includes lands currently zoned for agricultural, not residential, uses. A zone change would be part of the annexation and subsequent development process. General Plan 2050 provides the framework and policies for this process to occur according to the City's (not the County's) vision. No property owner would be required to develop, and there will be no eminent domain. This comment does not pertain to the CEQA process and is not discussed further within this EIR.
Casey Meusel	What is relationship between General Plan schedule and EIR schedule?	The general Plan and CEQA document will be released for public review at the same time. Chapter 1, Introduction of this EIR outlines when and where the Draft EIR will be available for public review.
Casey Meusel	Are the growth projection numbers in the NOP final?	Growth projections under General Plan 2050 can be found in Chapter 2, Project Description and Chapter 6, Growth-Inducing Impacts of this EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Brian Lockwood	Projected growth will increase water demand and stress on the over drafted Pajaro Valley Groundwater Basin and careful consideration must be given to the impacts of projected growth.	A discussion of the water demand under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Brian Lockwood	Projected growth will increase the amount of impervious surface areas in the project area that could reduce recharge and increase stormwater runoff. Careful consideration of the impacts from increased surface area should be considered as should mitigation opportunities such as retention basins, permeable pavement, dry wells, swales, etc.	A discussion of water quality from increases in impervious surfaces under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Brian Lockwood	A mandate requiring water efficient devices, technology, and infrastructure to offset additional groundwater demand should be considered as a mitigation measure for future growth and development.	A discussion of the water demand, including General Plan policies that reduce water demand, under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Brian Lockwood	Drought-tolerant landscapes should be considered as mitigation measures.	A discussion of General Plan policies that reduce water demand and runoff under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Brian Lockwood	Water quality impacts from residential and non-residential development should be evaluated and mitigation measures to reduce impacts should be considered.	A discussion of water quality from increases in impervious surfaces under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Brian Lockwood	Cumulative impacts on groundwater resources from proposed developments in the Pajaro Valley Groundwater Basin should be evaluated and include developments outside City limits but within the limits of the Basin.	A discussion of cumulative impacts related to water quality and groundwater supply is provided in Section 5.1.10, Hydrology and Water Quality within Chapter 5, Cumulative Impacts of this EIR.
Native American Heritage Commission (NAHC)		
Matthew Lin	The NAHC noted their receipt of the NOP and outlined requirements for the compliance with Assembly Bill 52 and Senate Bill 18 as well as their recommendation for the preparation of Cultural Resources Assessments.	The City conducted the required tribal consultation for the General Plan 2050 EIR, including Assembly Bill 52 and Senate Bill 18 consultation. Please see Section 4.18, Tribal Cultural Resources , for a discussion of the consultation that occurred between the City and

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
		applicable tribes or other Native American representatives.
Amah Mutsun Tribal Band of San Juan Bautista		
Irenne Zwierlein	The Amah Mutsun Tribal Band of San Juan Bautista offers their services to consult on the project.	The City conducted the required tribal consultation for the General Plan 2050 EIR, including Assembly Bill 52 and Senate Bill 18 consultation. Please see Section 4.18, Tribal Cultural Resources , for a discussion of the consultation that occurred between the City and applicable tribes or other Native American representatives.
Irenne Zwierlein	The Amah Mutsun Tribal Band of San Juan Bautista suggests the search of the Sacred Lands Files and California Historical Resource Information Systems as well as coordination with the Native American Heritage Commission if it has not already been conducted.	A Sacred Lands Files and California Historical Resource Information Systems was conducted for General Plan 2050. Please refer to Section 4.5, Cultural Resources , for a discussion on the results of those searches.
Irenne Zwierlein	The Amah Mutsun Tribal Band of San Juan Bautista provides recommendations should positive cultural or historic sensitivity be received within one mile of the plan area.	A discussion of mitigation measures for cultural and tribal cultural resources is provided in Section 4.5, Cultural Resources , and Section 4.18, Tribal Cultural Resources , respectively.
California Department of Fish and Wildlife (CDFW)		
Erin Chappell	CDFW notes that they are providing content for inclusion in the environmental document and that CDFW will act as a Responsible Agency for the project under CEQA.	Section 9.2, Agencies Consulted of Chapter 9, Lead Agency and Consultants , lists agencies consulted throughout the Draft EIR process. However, because General Plan 2050 is a plan for development and mobility in Watsonville and does not propose specific projects requiring permits or approvals other than adoption of General Plan 2050, additional responsible and trustee agencies may be applicable depending on the nature and location of the future development project.
Erin Chappell	CDFW provided the provisions of relevant regulatory requirements including the California Endangered Species Act, Lake and Streambed Alteration, and the	Subsection 4.4.1, Environmental Setting of Section 4.4, Biological Resources lists the provisions of the California Endangered Species

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	Migratory Bird Treaty Act	Act, Lake and Streambed Alteration, and Migratory Bird Treaty Act.
Erin Chappell	CDFW requests that the following information be included in the project description: • Land use changes resulting from, for example, rezoning certain areas. • Footprints of permanent project features and temporarily impacted areas, such as staging areas and access routes. • Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems. • Operational features of the project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features. • Construction schedule, activities, equipment, and crew sizes.	Land use changes, including those associated with rezoning are discussed in Section 4.11 Land Use. General Plan 2050 is a plan for development and mobility in Watsonville and does not propose specific project features such as project footprints, staging areas, anticipated buildings/structures, ground disturbing activities, or construction details. These details would be provided for individual development projects. Noise and traffic generation are discussed in Section 4.13, Noise and Section 4.17, Traffic, respectively.
Erin Chappell	CDFW provides recommendations for information to be included in the environmental setting including baseline habitat assessments for special-status species, description of aquatic habitats and any sensitive natural communities or riparian habitat, and any stream or wetland set back distance the City of Watsonville may require. CDFW also provided the listed species and other special-status species or sensitive natural communities known to occur in or near the plan area. CDFW recommends that habitat descriptions and species profiles include robust information from multiple sources and that recommended survey protocols be followed.	Subsection 4.4.1, Environmental Setting of Section 4.4, Biological Resources, discusses baseline conditions for special-status species, aquatic habitats, natural communities and riparian habitat, and setback distances. As described in Section 4.4, reconnaissance-level surveys were conducted for the plan area in 2025 for habitats capable of supporting special-status plant and wildlife species. Site-specific surveys would be required for future development projects.
Erin Chappell	CDFW notes that CEQA requires the following impacts to be discussed in the EIR: • Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development	Land use changes resulting from implementation of General Plan 2050 are discussed in Section 4.11, Land Use and Planning. Conversion of open space and agricultural land are described in Section 4.16, Recreation and Section 4.2, Agriculture and Forestry

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	• Changes in hydrological conditions that could alter the timing and magnitude of streamflow both during construction and operation of the project • Potential for impacts to special-status species • Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks) • Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence • Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features • Water quality impacts resulting from construction and operation of the project • Impacts both from construction and operation of the project • Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat The EIR should also analyze any potential cumulative impacts associated with existing and reasonably foreseeable future projects in the plan area."	Resources, respectively. A discussion of hydrological conditions, including water quality, is provided in Section 4.10, Hydrology and Water Quality and impacts to aquatic habitat and stream flows are discussed in Section 4.4 Biological Resources. Discussions related to impacts to special-status species, nesting birds, habitat disturbance, wildlife corridors, and bed, channel, bank, and riparian habitat are discussed in Section 4.4 Biological Resources. A discussion of cumulative impacts is provided in Chapter 5, Cumulative Impacts.
Erin Chappell	CDFW presents potential impacts to biological resources including riparian habitats, Santa Cruz tarplant, Tricolored blackbird, California red-legged frog, and State fully protected species within the plan area as well as potential mitigation measures to reduce impacts to these resources.	Discussions related to impacts to special-status species, nesting birds, habitat disturbance and relevant mitigation measures are discussed in Section 4.4 Biological Resources .
Erin Chappell	CDFW requires that information developed in EIRs be incorporated into a database which may be used to prepare subsequent CEQA documents and that any special-status species and natural communities detected during project surveys be reported to the California Natural Diversity Database.	Information developed in the EIR will be incorporated into CDFW's online database in accordance with Public Resources Code Section 21003, subdivision (d) & (e). This comment does not pertain to the CEQA process and is not discussed further within this EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Erin Chappell	CDFW anticipates the project will have an impact on fish and/or wildlife and filing fees for the Environmental Document will be required.	Upon approval of General Plan 2050, the City will file the EIR with the Santa Cruz County Clerk, at which time the appropriate CDFW filing fees will be paid.
Erin Chappell	CDFW recommends eliminating all non-essential artificial lighting. If artificial lighting is necessary, CDFW recommends avoiding or limiting the use of artificial lights during the hours of dawn and dusk, when many wildlife species are most active. CDFW also recommends that outdoor lighting be shielded, cast downward, and does not spill over onto other properties or upwards into the night sky (see the International Dark-Sky Association standards at https://darksky.org/) and limited to warm light colors with an output temperature of 2700 kelvin or less.	General Plan 2050's effect on light and glare is discussed in Section 4.1, Aesthetics of this EIR.
Erin Chappell	CDFW recommends that storm runoff be dispersed rather than concentrated to a stormwater outfall or other receiving waters. CDFW recommends implementation of Low Impact Development (LID) and the use of bioswales and bioretention features to intercept storm runoff. CDFW also recommends incorporating permeable surfaces throughout the plan area to allow stormwater to percolate in the ground and prevent stream hydromodification (see for example: Evaluating the potential benefits of permeable pavement on the quantity and quality of stormwater runoff, https://www.usgs.gov/centers/upper-midwest-water-science-center/science/evaluating-potential-benefits-permeable-pavement).	A discussion of water quality and stormwater runoff from increases in impervious surfaces under General Plan 2050 is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Erin Chappell	CDFW recommends the project establish and the Draft EIR incorporate riparian buffer zones along all rivers, lakes and streams to prohibit development and vegetation clearing to outside of and away from riparian areas. Riparian buffers should include all perennial, intermittent and ephemeral streams. CDFW is available to consult with the City to determine appropriate riparian buffers to reduce impacts to special-status species and riparian habitat to less-than-significant.	The use of riparian buffers to reduce impacts to special-status species is described in Section 4.4. Biological Resources of this EIR.
Erin Chappell	Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping, an experienced botanist, familiar with the native plant communities of Santa Cruz County shall conduct a focused Santa Cruz	Mitigation measures to protect biological resources, including the need for floristic surveys, are discussed in Section 4.4, Biological Resources of this EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	tar plant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire plan area where potential Santa Cruz tar plant habitat has been identified, prior to the initiation of construction and the results shall be included in the project environmental document. Surveys shall be conducted according to: Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (CDFW 2018), available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline .	
Erin Chappell	If Santa Cruz tarplant is detected or likely to occur within the plan area, additional measures may be needed to avoid, minimize, and/or mitigate potential project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the project proponent shall obtain an Incidental Take Permit pursuant to Fish and Game Code section 2081, subdivision (b) (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9). Information on the ITP process is available at https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits . In addition, CDFW recommends continued coordination to develop additional measures.	Mitigation measures to protect biological resources, including the need for floristic surveys, are discussed in Section 4.4, Biological Resources of this EIR.
Erin Chappell	CDFW recommends that a qualified biologist conduct a habitat assessment of the plan area in advance of project implementation, to determine if the plan area or its vicinity contains suitable habitat for tricolored blackbirds.	Surveys conducted for General Plan 2050 as well as mitigation measures to protect biological resources, including tricolored blackbirds, are discussed in Section 4.4, Biological Resources of this EIR.
Erin Chappell	CDFW recommends that project activities be timed to avoid the typical bird breeding season (February 1 through September 15). However, if project activities must take place during that time, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting tricolored blackbirds no more than 10 days prior to the start of implementation to evaluate presence/absence of tricolored blackbirds nesting colonies in proximity to project activities and to evaluate potential project-related impacts.	Mitigation measures to protect biological resources, including tricolored blackbirds, are discussed in Section 4.4, Biological Resources of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Erin Chappell	If an active tricolored blackbirds nesting colony is found during pre-activity surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer in accordance with CDFW’s “Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=99310&inline” (CDFW 2015b). CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival. It is important to note that tricolored blackbirds colonies can expand over time and for this reason, the colony may need to be reassessed to determine the extent of the breeding colony within 10 days prior to project initiation. In the event that a tricolored blackbirds nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code Section 2081(b), prior to any ground-disturbing activities.	Mitigation measures to protect biological resources, including tricolored blackbirds, are discussed in Section 4.4, Biological Resources of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.
Erin Chappell	California Red-Legged Frog Surveys: CDFW recommends that a qualified wildlife biologist conduct surveys for California red-legged frog in accordance with the USFWS “Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83914&inline” (USFWS 2005) to determine if California red-legged frog are within or adjacent to the plan area.	Discussions related to impacts to California red-legged frog and relevant mitigation measures are discussed in Section 4.4 Biological Resources of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.
Erin Chappell	California Red-Legged Frog Avoidance: If any California red-legged frog are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when California red-legged frog are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for California red-legged frog.	Discussions related to impacts to California red-legged frog and relevant mitigation measures are discussed in Section 4.4 Biological Resources of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Erin Chappell	CDFW recommends that the project completely avoid impacts to fully protected species.	Discussions related to impacts to special-status species and relevant mitigation measures are discussed in Section 4.4 Biological Resources of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.
Caltrans		
Jacob Hernandez	Caltrans notes that new developments resulting from the General Plan update should provide a Vehicle Miles Traveled (VMT) based Traffic Impact Study. The Traffic Impact Study will also need to identify the project's near-term and long-term safety and operational issues, on or adjacent any existing or proposed State facilities.	A VMT analysis for General Plan 2050 and safety impacts are discussed in Section 4.17, Transportation of this EIR.
Jacob Hernandez	Caltrans notes that any improvements in the Caltrans right-of-way from future development will be required to comply with the Caltrans Highway Design Manual guidelines and standards and that any pedestrian facility enhancements from future housing development projects within the Caltrans right-of-way will need to comply with Caltrans Design Information Bulletin 82-06.	Discussions of right-of-way acquisition and improvements in the Caltrans right-of-way are discussed in Section 4.17, Transportation . Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review.
Jacob Hernandez	Caltrans looks forward to working with the City to evaluate potential Complete Streets and multi-modal mobility projects.	This comment describes a desire to continue working with the City on proposed projects in the City related to Complete Streets and multi-modal mobility. Accordingly, this comment is not evaluated in the EIR.
Jacob Hernandez	Caltrans notes that any Caltrans facilities impacted by the plan must meet American Disabilities Act (ADA) Standards after project completion and maintain bicycle and pedestrian access during construction.	A discussion of ADA compliance is provided in Section 4.17, Transportation of this EIR.
Jacob Hernandez	Caltrans acknowledges the link between development and traffic congestion and encourages the continued coordination to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.	This comment describes a desire to continue working with the City on proposed projects in the City related to intersection and interchange improvements. Accordingly, this comment is not evaluated in the EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Jacob Hernandez	Caltrans notes that any work performed within Caltrans right-of-way will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans right-of-way prior to construction.	Discussions of right-of-way acquisition and improvements in the Caltrans right-of-way are discussed in Section 4.17, Transportation of this EIR. Additionally, General Plan 2050 is a plan level document, and individual development projects would be subject to subsequent environmental review and approval.
Jacob Hernandez	Caltrans note that climate change's impact on the State Highway System and local roadways should be addressed given the forecasted regional increase in wildfires, precipitation, and storm surge.	A discussion of General Plan 2050's impact on climate change is available in Section 4.8, Greenhouse Gas Emissions of this EIR.
Monterey Bay Air Resources District (MBARD)		
Edwin Ballaron	The MBARD recommends the City of Watsonville review the California Climate Investment Priority Population map as part of the plan area is designated as a disadvantaged community.	A discussion of the California Climate Investment Priority Population Map is included in Section 4.8, Greenhouse Gas Emissions of this EIR. Additionally, as discussed in Chapter 2, Project Description , under SB 1000, jurisdictions are required to consider Environmental Justice in the General Plan if disadvantaged communities are present within their planning area.
Edwin Ballaron	MBARD notes that the planned growth exceeds the thresholds for potential significance and should be quantitatively addressed in the EIR using a modelling approach.	A qualitative discussion of air quality emissions is available in Section 4.3, Air Quality of this EIR.
Edwin Ballaron	MBARD supports incorporating electric vehicle infrastructure goals in General Plan 2050 and suggests including publicly available dual port Level 2 and DC fast-charge charging stations throughout the plan area.	General Plan 2050 supports the implementation of electric vehicle infrastructure. For policies related to electric vehicle charging, please refer to Section 4.3, Air Quality of this EIR.
Edwin Ballaron	MBARD suggests projects incorporate mitigation measures to limit VMT, including adding walkable spaces in the community, including bike lanes and trails, and investing in a mass transit system utilizing electric vehicle technology to limit emissions.	For a discussion on VMT associated with General Plan 2050, please refer to Section 4.17, Transportation . A qualitative discussion of air quality emissions is available in Section 4.3, Air Quality of this EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Edwin Ballaron	MBARD recommends that City consider sensitive receptors when addressing land use and future growth to minimize or eliminate significant impacts on local or regional air quality.	A qualitative discussion of air quality emissions, including effects on sensitive receptors, is provided in Section 4.3, Air Quality of this EIR.
Monterey-Salinas Transit (MST)		
Emma Patel	MST requests that the EIR identify the appropriate mitigation measures to address environmental impact related to the General Plan update. MST provides existing passenger service between Watsonville and Salinas and recommends that the EIR include a map of MST's routes and bus stops in the transportation chapter.	Section 4.17, Transportation discusses bus service provided to the City, including those provided by MST. Figure 4.17-2 shows bus routes in the plan area.
Emma Patel	MST requests that the City of Watsonville consider pedestrian infrastructure improvements along major transportation corridors to incentivize transit use and active transportation as the population is transit dependent. MST also recommends the use of Transportation Demand Management measures to mitigate potentially significant impacts related to transportation.	Section 4.17, Transportation describes both pedestrian and active transportation improvements planned under General Plan 2050 as well as the development of a Transportation Demand Management plan.
Emma Patel	MST requests that the General Plan update include goals/policies that support infill and transit-oriented development to mitigate the potential negative land-use effects identified in the EIR. MST also recommends the City use MST's Transit-Oriented-Development (TOD) Planning Study as a resource to access TOD opportunity sites throughout Watsonville that have access to existing transit services and facilities.	Chapter 2, Project Description , describes that most of the development under General Plan 2050 would be infill development. Section 4.17, Transportation describes transit improvements associated with General Plan 2050.
Santa Cruz County Farm Bureau		
Dennis Webb	The Farm Bureau notes that the anticipated growth involves amending the existing urban limit line to expand to farm sites. The Farm Bureau states the Urban Limit Line is a planning tool enacted by voters and should not be expanded. Growth on prime farmland would represent a significant and unavoidable impact and	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	alternatives should be explored.	does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands under General Plan 2050.
Resident		
Patricia Fohrman	Patricia expresses concern regarding the development of agricultural land, the stress of new development on existing [transportation] infrastructure, transportation infrastructure to the airport, and the quality of housing, affordable housing in particular.	Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands under General Plan 2050. Transportation impacts are evaluated in Section 4.17, Transportation and housing impacts, including affordable housing, are discussed in Section 4.14 Population and Housing .
Patricia Fohrman	What is the city going to do to deal with endangered species in some areas?	Section 4.4, Biological Resources analyzes potential impacts and relevant mitigation measures to protect endangered species that could be affected by General Plan 2050.
Patricia Fohrman	Has AMBAG been contacted regarding the preparation of the GPU and the NOP? What is measure U process looking like? How about the annexation process?	AMBAG was included in the distribution list for the NOP and will be notified of the 45-day public review period of the Draft EIR. Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future.
Judy Zachariasen	The area of influence for General Plan 2050 includes the Holocene-active Zayante-Vergeles fault zone, which is part of an Alquist-Priolo (A-P) Earthquake Fault Zone of Required Investigation. While this zone is not within a designated "Area of Projected Growth," the EIR should evaluate the risk of surface fault rupture and	Section 4.7, Geology and Soils evaluates the risk of fault rupture and ground shaking from nearby active faults including the Zayante-Vergeles, San Andreas, and San Gregorio faults.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	consider the potential for significant ground shaking due to nearby active faults like the San Andreas and San Gregorio-Hosgri. Addressing these seismic hazards is essential for the project's design.	
Judy Zachariasen	The California Geological Survey (CGS) has not assessed the Watsonville area for liquefaction and landslide hazards, meaning the absence of mapped zones does not confirm the absence of risk. Consequently, the Draft EIR should also examine potential liquefaction and landslide hazards and discuss their implications for the design and components of any proposed developments.	Section 4.7, Geology and Soils evaluates the potential for liquefaction and landslide hazards associated with General Plan 2050.
Ramon Gomez	The EIR must recognize the voter-approved Urban Limit Line as the guiding policy for growth and development. Urban growth should be concentrated within the existing Urban Limit Line, and any scenario that proposes expansion beyond these boundaries must be clearly identified as inconsistent with the will of Watsonville’s voters and the County of Santa Cruz’s policies for protecting commercial agricultural lands.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural uses under General Plan 2050.
Ramon Gomez	Any proposal to develop prime agricultural land should acknowledge the irreversible loss of high-quality farmland as an unavoidable adverse impact. The Draft EIR must not merely view these lands as vacant space for projected urban expansion but should instead recognize their intrinsic value to Watsonville’s economy, environment, and cultural heritage. Protecting agricultural lands is not just about preserving open space, it is about preserving the identity and economic foundation of a community that has thrived on farming for generations.	Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Kim Tschantz	The Land Use and Planning section of the EIR should identify the 55-acre Gateway Area as currently designated by the County of Santa Cruz General Plan as “Agriculture” land use with an “Agricultural Resource” overlay and within the “CA” (Commercial Agriculture) zoning district. These designations are reserved for prime agricultural land that have the characteristics to support large-scale commercial	Chapter 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050. Future annexation would be subject to voter approval. General Plan

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	crop (or livestock) production. Converting these lands to non-agricultural use would be in conflict with these designations. Annexations of these 55 acres beyond the adopted Urban Limit Line would also be in conflict with the City's Urban Limit Line that was approved by the voters originally by Measure U in 2002 and reaffirmed by the voters with the passage of Measure Q in 2022.	2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future.
Kim Tschantz	It should also be noted that an attempt to expand the Urban Limit Line in the intervening years to include the Gateway Area by Measure T was soundly rejected by the City's voters. Clearly, the sentiment of the voters is to retain the Gateway Area in agriculture.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Kim Tschantz	The Agriculture and Forestry Resources section of the EIR will need to describe any conversion of the 55-acre Gateway Area as an unavoidable adverse impact. This would also generate a significant irreversible environmental change as should be described as such in the appropriate section of the EIR.	Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Kim Tschantz	The Alternatives section of the EIR must include an alternative to avoid the unavoidable impact on agricultural resources discussed above. This alternative would describe how the City could meet its residential and commercial growth goals within the adopted Urban Limit Line. The Measure Q committee (Committee for Planned Growth and Farmland Protection) prepared a Section 9212 Report that identified areas within the Urban Limit Line that were available for residential and commercial development. A copy of this report was submitted to the City's Department of Community Development. The report also discusses how several properties along arterial corridors (e.g. East Lake Ave, Freedom Blvd.) could be rezoned and designated by a new General Plan to encourage Smart Growth mixed use projects with three and four-story heights. This type of development is already	Chapter 8, Alternatives , describes the alternatives considered for General Plan 2050, many of which would reduce the amount of agricultural land, including areas of Prime Farmland and Farmland of Statewide Importance.

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	encouraged by the City's Downtown Specific Plan. Information from the 9212 Report would be a useful first step in preparing the Alternative based on the existing Urban Limit Line.	
Kim Tschantz	Will there be an opportunity for comment during the meeting?	Public comments attained during the scoping meeting are provided in this table.
Kim Tschantz	It is unfair to character Kim as an opponent to all projects in the city, he is supportive for a lot of projects that may contribute to the city's development.	This comment does not pertain to CEQA and is not addressed in this EIR.
Kim Tschantz	Appreciate NOP meeting	Comment noted. This comment does not pertain to CEQA and is not addressed in this EIR.
Kim Tschantz	Under land use and planning, would help that the EIR include an assessment of how the proposal dealing with the 55-acre prime farmland would conflict with County general plan, zoning, and land use plan.	Chapter 4.2 Agriculture and Forestry Resources analyzes impacts associated with conversion of prime farmland con conflicts with established plans and policies.
Kim Tschantz	Hopes that the EIR would deal with measure U and Q of the City's ULL, and the voter's rejection of measure T which would have enabled the expansion of the urban limit line to include the 55-acre area added to the Highway 1 Gateway. It is understood that EIR is analytical, but as CEQA guideline pointed out, it is informational to help public understand the project information. Thus, an analysis of how the EIR inflicts with the ULL measures is important.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how proposed or potential annexation areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Kim Tschantz	Suggests that the EIR has not selected alternatives yet, at least one alternative needs to be analyzed, where all developments are limited within the existing ULL. The EIR needs to Study ability to meet City growth needs within the existing (Measure U/Q) urban limit line. The measure Q and 9212 report submitted by the committee can be useful in the alternative development process.	The EIR will evaluate a range of reasonable alternatives aimed at reducing the environmental impacts associated with the General Plan in accordance with CEQA Guidelines Section 15126.6 (a)-(f). Project alternatives are discussed in Chapter 8, Alternatives of this EIR.
Dianna	What are we actually reviewing today?	The NOP and NOP scoping meeting for General Plan 2050 are used to

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		garner community input that will be further evaluated in the EIR. This comment does not pertain to CEQA and is not evaluated in this EIR.
Dianna	Is there another overlay of streets on the map? (Need a distinct map of addressed) - Looking at the gateway and the freeway boundary.	A map of the General Plan 2050 footprint and expansion areas is located in Chapter 2, Project Description .
Dianna	When is development outside the city limits expected to occur?	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future.
Lowell Hurst	In favor of more economic opportunities (Supports this plan) - more revenues can be used for public services and recreational opportunities.	The City appreciates the support of General Plan 2050. Economic opportunity is not discussed under CEQA, but job forecasts under General Plan 2050 can be found in Chapter 2, Project Description of this EIR.
Lowell Hurst	The city is already highly densified (one of the most dense cities along the central coast), yet need more housing and more jobs - job and housing balance is not normal now. Introduce new jobs that are agriculturally based.	Economic opportunity is not discussed under CEQA, but job forecasts under General Plan 2050 can be found in Chapter 2, Project Description of this EIR. An analysis of housing to be added under General Plan 2050 is included in Section 4.14, Population and Housing of this EIR.
Lowell Hurst	Watsonville needs “elbow room.”	The proposed expansion of the Watsonville Urban Limit Line is discussed in Chapter 2, Project Description of this EIR.
Lowell Hurst	The plan needs to be finalized and bulletproofed. Need to come to actualize and come to fruition. Plan looks way out into the future and Watsonville needs relief right away: housing, recreational opportunities, etc.	The City appreciates the support of General Plan 2050. General Plan 2050 is subject to approval by the Planning Commission and City council upon completion of the Final EIR.
Lowell Hurst	Focusing on the true community needs is the most important part of the plan, including reviewing the demographics, job-housing balance, environmental conditions in the city and considering how to strengthen the communities.	General Plan 2050’s impact on communities including population, housing, and jobs is available in Section 4.14, Population and Housing of this EIR.

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	Hopefully the plan can lead us to a better future.	
Lowell Hurst	There are tremendous opportunities along the freeway, and will be helpful to the economic condition of Watsonville. No one wants to see farmlands to be taken over, but there is a tremendous need for revenue in the city that could be accomplished by attracting visitors driving along the highway ("Swipe their credit cards").	Development of the Highway 1 Gateway would involve conversion of unincorporated agricultural land. Conversion of agricultural land is analyzed in Section 4.2, Agriculture and Forestry Resources of this EIR. Tourism is not a consideration under CEQA. Accordingly, this comment is not evaluated in the EIR.
Marta Bulaich	Have slides from previous presentations been published online and will these Scoping Meeting slides be published online? How are comments collected?	Presentations provided at the scoping meetings are available online. Accordingly, this comment is not evaluated in the EIR.
Marta Bulaich	Have people in the industrial areas been notified and has the NOP been distributed to them? Will there be development in these areas? Have all stakeholders been notified?	Industrial stakeholders were notified during the NOP process. The outreach process has included public workshops, community meetings, board and commission presentations, and pop-up events. Notifications of meetings and events have been emailed to all those on the distribution list, which is broad. Anyone is welcome to attend the community meetings. Also, there is a City Council member that represents the industrial areas. No development under General Plan 2050 has occurred to date. The EIR incorporates comments received during this public review period. Once the EIR is published, interested parties will have 45-days to respond to the Draft EIR. Accordingly, this comment is not evaluated in the EIR.
Marta Bulaich	Will the EIR study small business and job preservation? Is that a current or later study? Are large businesses considered?	EIRs do not study business and job preservation. Policies supporting job and business preservation, however, will be included in General Plan 2050. An analysis on displaced businesses is included in Section 4.14, Population and Housing of this EIR.
Marta Bulaich	When is the general plan going to be completed?	The General Plan and EIR are two separate documents that are scheduled to be released for public review at the same time. Both documents will be completed following Planning Commission and City Council approval of the Final EIR and General Plan.

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Marta Bulaich & others	Moving forward, will there be additional public meetings? Recommend presenting to South County Triage Group meeting, pop-up event at California Grille and at California Indigenous Day.	A public meeting will be held during the 45-day public review period of the Draft EIR. Chapter 1, Introduction of this EIR outlines when and where the Draft EIR will be available for public review as well as when the public meeting will occur. Public notification will be provided for any additional public meetings.
<i>Multiple Commentors</i>	What is the Sphere of Influence?	The Sphere of Influence is an identified area within the County where future annexation could occur. The areas bounded by the Urban Limit Line, which was identified in previous planning efforts, is within the sphere of influences but need to be annexed by the city before development can occur. Descriptions of the Sphere of Influence and Urban Limit Line are available in General Plan 2050
<i>Multiple Commentors</i>	Questions regarding plans for unincorporated area and annexation potentials.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future
<i>Multiple Commentors</i>	What uses are envisioned for Area G and the Highway 1 Gateway area?	The General Plan recommends that only a portion of Area G be developed, the Highway 1 Gateway area, which is envisioned to be a commercial and visitor-serving area that accommodates regional retail and hotels. Other considerations include recreational fields and a potential minor league soccer stadium. These uses will provide jobs and raise revenue. Details on development of the Highway 1 Gateway area can be found in General Plan 2050 or Chapter 2, Project Description of this EIR.
Patricia Fohrman	How will future expansion be supported by current infrastructure?	The plan will look at the existing infrastructure. Like the DWSP, a similar approach would be taken for the GP update.

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Becky Steinbruner	Keep Watsonville airport open and do not close the crosswind runway so access during emergencies is not impacted.	The closure or reconfiguration of Runway 9/27 is not proposed as part of General Plan 2050 and is not a component of the project evaluated in this EIR. Accordingly, the EIR analyzes airport compatibility and related environmental effects based on current airport facilities and operations and reasonably foreseeable conditions associated with implementation of General Plan 2050. While General Plan 2050 includes land use policies that provide a framework for addressing potential future changes in airport operations or applicable airport compatibility requirements, any future decision to close or reconfigure Runway 9/27 would constitute a separate action subject to its own review and approvals. Therefore, the potential closure of Runway 9/27 is not analyzed in this EIR.
Becky Steinbruner	Will tree removal within the Buena Vista Area be considered by the EIR?	Tree removal associated with implementation of General Plan 2050 is analyzed in Section 4.4, Biological Resources .
Becky Steinbruner	Regarding the Highway 1 Gateway, is it currently agricultural land and therefore does its development violate Santa Cruz County Measure J? Also, Also, the Redman-Hirahara house is on the national historic register - it has profound historic significance for the area.	Development of the Highway 1 Gateway would involve conversion of unincorporated agricultural land. Conversion of agricultural land is analyzed in Section 4.2, Agriculture and Forestry Resources of this EIR. Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Impacts to historic resources are evaluated in Section 4.5, Cultural Resources of this EIR.
Becky Steinbruner	Concern about stormwater capture and cleansing so does not pollute the sloughs.	Impacts from stormwater runoff are analyzed in Section 4.10, Hydrology and Water Quality of this EIR.
Becky Steinbruner	Concerns that the NOP is not readily available - could not find on the General Plan 2050 website. Recommend that a link be added to the General Plan 2050 website.	Comment has been noted. The NOP is a scoping-level document that is used to garner community input that will be further evaluated in the EIR. This comment does not pertain to CEQA and is not evaluated

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		in this EIR.
Becky Steinbruner	Request that increased water demand be studied.	Impacts to water demand are evaluated in Section 4.10, Hydrology and Water Quality and Section 4.19, Utilities .
Pajaro Valley Prevention		
Jasmine Najera	Lack of housing and lack of recreational activities are problems for lower income communities.	An analysis on housing and recreation are included in Section 4.14, Population and Housing and Section 4.16, Recreation of this EIR, respectively.
Watsonville Wetlands Watch		
Dawn Reis	The Watsonville Wetlands Watch (WWW) notes that the anticipated growth involves amending the existing Urban Limit Line to expand to farm sites which contain important wetlands. WWW states the Urban Limit Line is a planning tool enacted by voters and should not be expanded. Growth on prime farmland would represent a significant and unavoidable impact and the EIR should discuss the value and purpose of protecting and valuing farmlands and wetlands as opposed to viewing them as areas for projected growth.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the city's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Subsection 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050. Impacts to wetlands are discussed in Section 4.4, Biological Resources of this EIR.
Santa Cruz County Regional Transportation Commission		
Luis Mendez	The Santa Cruz County Regional Transportation Commission (RTC) expresses appreciation for Watsonville's efforts to align General Plan 2050 with community priorities. The outlined improvements have the potential to enhance transportation safety and reduce vehicle miles traveled (VMT) by increasing transit use.	This comment describes a desire to continue working with the City on proposed projects related to transportation safety and VMT. Accordingly, this comment is not evaluated in the EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Luis Mendez	The RTC supports Watsonville’s focus on creating complete streets while preserving natural spaces, especially in high-density areas. This aligns with the 2045 Regional Transportation Plan (RTP) goals to improve community livability, health outcomes, and reduce pollution, as well as enhance transportation safety for vulnerable users.	This comment supports the City’s focus on creating complete streets as part of General Plan 2050. For additional details regarding complete streets, see Section 4.17, Transportation of this EIR.
Luis Mendez	The RTC highlights its Santa Cruz County Rural Highway Safety Action Plan (RHSP), which aims to improve safety on rural highways, including Highways 129 and 152 near Watsonville. They encourage coordination with Watsonville to align city improvements with this plan.	Section 4.17, Transportation of this EIR includes a discussion of the Rural Highway Safety Action Plan.
Luis Mendez	The RTC recommends establishing safe connections between housing, economic centers, and new developments. Expanding Transportation Demand Management (TDM) programs is suggested to reduce VMT and encourage sustainable transportation choices. The RTC offers support in developing TDM strategies.	Section 4.17, Transportation describes both pedestrian and active transportation improvements planned under General Plan 2050 as well as the development of a TDM plan.
Luis Mendez	After attending the EIR scoping meeting, the RTC emphasizes the need to address transportation impacts, particularly for vulnerable populations like the elderly and disabled. The RTC urges prioritizing pedestrian and bicycle safety in Watsonville’s plans.	Section 4.17, Transportation describes both pedestrian and active transportation improvements planned under General Plan 2050 as well as transportation impacts associated with General Plan 2050.
Sarah Christensen	Regarding the additional 55 acres of prime agricultural land in the Highway 1 Gateway planning area, the RTC notes the overlap between this area and the existing RTC owned rail line. While there is no residential development proposed for the Gateway area, there are opportunities for access to the trail and potential future passenger rail stop at the Downtown Watsonville Station.	Section 4.17, Transportation describes proposed improvements to passenger rail in the City.
Sarah Christensen	The RTC would like to coordinate with the City of Watsonville as plans progress to ensure proposed projects with the Gateway area along the rail line are not in conflict with the publicly owned right-of-way.	This comment describes a desire to continue working with the City on proposed projects in the Highway 1 Gateway area along existing rail lines. Accordingly, this comment is not evaluated in the EIR.
Sierra Topp	Briefly introduce Santa Cruz Regional Transportation Commission and its role in	Section 4.17, Transportation of this EIR describes Santa Cruz Regional Transportations Commission's role in evaluating transportation

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	the GP update.	impacts.
Watsonville Airport Advisory Committee		
Rayvon Williams	Airport Management and Watsonville Airport Advisory Committee suggest the EIR options considered are consistent with the Airport Land Use Compatibility Plan (ALUCP) requirements.	The City has prepared a draft ALUCP to be adopted with and included in the General Plan 2050 (see Chapter 8 Airport Element and Appendix B of General Plan 2050) which is consistent with airport compatibility criteria in Caltrans Division of Aeronautics' 2011 California Airport Land Use Planning Handbook. The ALUCP establishes criteria addressing aircraft noise, safety, airspace protection, and overflight to minimize potential conflicts. For a discussion of whether the General Plan would result in a safety hazard or excessive noise for people residing or working in the plan area, please see Section 4.9, Hazards and Hazardous Materials and Section 4.13, Noise. The closure or reconfiguration of Runway 9/27 is not proposed as part of General Plan 2050 and is not a component of the project evaluated in this EIR, because it is being studied separately and has not been formally approved by FAA or the City. Accordingly, the EIR analyzes airport compatibility and related land use safety and environmental effects based on current airport facilities and operations and reasonably foreseeable conditions associated with implementation of General Plan 2050. While General Plan 2050 includes land use policies that provide a framework for addressing potential future changes in airport operations or applicable airport compatibility requirements, any future decision to close or reconfigure Runway 9/27 would constitute a separate action subject to its own review and approvals. Therefore, the potential closure of Runway 9/27 is not analyzed in this EIR.
Rayvon Williams	Airport Management and Watsonville Airport Advisory Committee suggest the EIR scope to include alternatives to runway closure with consideration for safety for those on the ground as well as the flying public, including normal and fog impacted	Please note that in accordance with Public Utilities Code Section 21675, the ALUCP is based upon the adopted 2023 Airport Master Plan and Airport Layout Plan (ALP) drawing set. Since the closure of

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	operations when the 02 runway end is obscured.	Runway 9/27 was not selected in the 2023 Airport Master Plan nor advanced in the FAA-approved 2023 ALP, the ALUCP does not include the closure of the Runway 9/27. Accordingly, closure of the crosswind runway is not part of the scope of the EIR. The EIR will evaluate a range of reasonable alternatives aimed at reducing the environmental impacts associated with the General Plan in accordance with CEQA Guidelines Section 15126.6 (a)-(f). Project alternatives are discussed in Chapter 8, Alternatives of this EIR.
Rayvon Williams	Airport Management and Watsonville Airport Advisory Committee suggest the EIR scope to include impact and alternatives to encroachment of dense housing in the airport area, including consideration of sky diving and IFR operations, missed approaches, training and noise sensitivity.	The General Plan 2050 in of itself does not propose changes that would directly affect airport operations, such as skydiving, IFR operations, missed approaches, or training activities. These operational considerations are more appropriately addressed through airport planning efforts, including the Airport Master Plan. Rather, the General Plan 2050 focuses on long-term land use designations and development patterns, and maintaining land use compatibility within the airport influence area consistent with the California Airport Land Use Planning Handbook. As such, detailed operational issues such as skydiving or specific flight procedures are outside the scope of the General Plan EIR's analysis. Aircraft-related safety and noise impacts associated with General Plan 2050 are addressed in Section 4.9, Hazards and Hazardous Materials and Section 4.13, Noise of the EIR. For a discussion of alternatives evaluated in the EIR, including no expansion into or development of Area A (Buena Vista), Area B (Atkinson Lane), and Area C new growth areas, please see Section 8.2, Alternatives to General Plan 2050.
Rayvon Williams	Airport Management and Watsonville Airport Advisory Committee suggest the EIR scope to include potential public safety impacts or limitations on disaster response associated with elimination of Runway 9/27.	As previously noted, the closure of Runway 9/27 is not a part of the scope of the EIR. For a discussion about whether implementation of the General Plan would result in inadequate emergency access, see Section 4.17,

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
		Transportation. Impacts resulting from airport safety hazards associated with implementation of General Plan 2050 are addressed in Section 4.9, Hazards and Hazardous Materials of the EIR
Rayvon Williams	The management board notes concerns regarding fire hazards in the Buena Vista Area.	Fire hazards, including those in the Buena Vista area are evaluated in Section 4.20, Wildfire of this EIR.
Rayvon Williams	The management board notes concerns regarding emissions and increased traffic associated with densification in Buena Vista Area.	Emissions and traffic associated with General Plan 2050 are discussed in Section 4.3, Air Quality and Section 4.17, Transportation , respectively of this EIR.
Rayvon Williams	The management board notes concerns regarding water availability for housing in Buena Vista and in general for the above target growth numbers called for in the draft General Plan 2050.	An analysis regarding water supply and water availability is provided in Section 4.10, Hydrology and Water Quality of this EIR.
Rayvon Williams	The Watsonville Airport Management reiterates the suggestion that the EIR scope to ensure the EIR options considered are consistent with the Airport Land Use Compatibility Plan (ALUCP) requirements.	Please see response above.
Rayvon Williams	The Airport Management reiterates the suggestion that the EIR scope to include alternatives to runway closure with consideration for safety for those on the ground as well as the flying public, including normal and fog impacted operations when the 02 runway end is obscured.	Please see response above.
Rayvon Williams	The Airport Management reiterates the suggestion that the EIR scope to include impact and alternatives to encroachment of dense housing in the airport area, including consideration of sky diving and IFR operations, missed approaches, training and noise sensitivity.	Please see response above.
Rayvon Williams	The Airport Management reiterate the suggestion that the EIR scope to include potential public safety impacts or limitations on disaster response associated with elimination of Runway 9/27.	Please see response above.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Rayvon Williams	The Airport Management requests that a confirmation of receipt to the suggestions to be prepared, and requests the City's indication on how these suggestions would be included (and potentially reasons for exclusion.	Please see response above.
Rayvon Williams	The management board reiterates concerns regarding fire hazards in the Buena Vista Area.	Please see response above.
Rayvon Williams	The management board reiterates concerns regarding emissions and increased traffic associated with densification in Buena Vista Area.	Please see response above.
Rayvon Williams	The management board reiterates concerns regarding water availability for housing in Buena Vista and in general for the above target growth numbers called for in the draft General Plan 2050.	Please see response above.
Committee for Planned Growth and Farmland Protection		
Sam Earnshaw	Only 2 percent of the planet has food-producing soils with this fertility in this Mediterranean climate. Amending the Urban Limit Line and adding this ground is not a responsible land use option, given the need for on-going and future food production in the face of increasing population and the changing climate.	Chapter 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Sam Earnshaw	City residents have repeatedly voted three times to protect this land, and this proposed action and amendment does not pay attention to the will of the people of Watsonville.	Future annexation would be subject to voter approval. General Plan 2050 serves as a guiding framework, establishing the groundwork for how potential annexed areas could be integrated into the City's overall planning and development strategy. While General Plan 2050 does not directly authorize annexation, it identifies key considerations and planning principles that will be applied if annexation moves forward in the future. Chapter 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and Forestry Resources describes the impacts from converting agricultural lands under General Plan 2050.
Sam Earnshaw	General Plan 2050 needs to acknowledge the unique value of these lands, and that	Chapter 4.2.2 Impacts and Mitigation in Section 4.2, Agriculture and

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
	removing them from production would be an unavoidable adverse and irreversible impact.	Forestry Resources evaluates the impacts from converting agricultural lands to non-agricultural lands under General Plan 2050.
Land Trust of Santa Cruz County		
Bryan Largay	The City recently presented the proposed General Plan update. It includes, in the Highway 1 Gateway Area, a "new growth area" that is outside the Urban Limit Line. A portion of this area is in close proximity to an Indigenous Cemetery near Lee Road. We [Land Trust of Santa Cruz County] recommend that this area be designated for land uses other than urban development on account of the sensitive cultural resources in the area. Commercial development of this area, as potentially proposed, could potentially disturb sacred sites and human remains.	Noted, the City has conducted the required tribal consultation for the General Plan 2050 EIR, including both Assembly Bill 52 and Senate Bill 18 consultation. Please see Section 4.18, Tribal Cultural Resources , for a discussion of the consultation that occurred between the City and applicable tribes or other Native American representatives. Individual development projects, including those in the Highway 1 Gateway area would be subject to subsequent CEQA review and tribal consultation to minimize impacts to tribal cultural resources.
City Council		
Casey Clark/ Marta Bulaich	The Manabe-Ow Specific Plan was supposed to generate 2,000 jobs, but it was not realized. Were the jobs be generated elsewhere, or it did not happen?	Development is subject to market conditions. Policies supporting job creation are included in General Plan 2050. Job preservation is not subject to CEQA, and thus is not included in this EIR.
Casey Clark/ Marta Bulaich	Would the general plan process be less contentious if there were more community outreach, especially to stakeholders?	The NOP and the scoping meeting are at the beginning of the environmental review process. The public has the opportunity to comment when draft documents are circulated for a 45-day public review period. The City will notify everyone on the email list. Chapter 1, Introduction of this EIR outlines when and where the Draft EIR will be available for public review.
Casey Clark/ Marta Bulaich	Suggest reaching out to property owners in the industrial areas and that own agricultural land in new growth areas. Also recommend involving individual Council members in the process.	The NOP and the scoping meeting are at the beginning of the environmental review process. The public has the opportunity to comment when draft documents are circulated for a 45-day public review period. The City will notify everyone on the email list. Chapter 1, Introduction of this EIR outlines when and where the Draft EIR will be available for public review. There are representatives of various constituencies on the City

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
		Council who have been invited to provide comments throughout the environmental review process.
Wetlands Watch Measure Q/U Group		
Sam Earnshaw	Agree with Kim. Only 2% of the planet has soils with this type of soil. Amending the urban limit line to replace prime farmland should be reconsidered considering the voters' will. The role of the farmland is very important in the region and is important in forming the region's appearance and economy.	<i>Comment noted</i>