

NOTICE OF EXEMPTION ATTACHMENT A

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**Subject: CEQA CE Consistency Analysis for the Proposed Runway 2-20 Pavement
Remarking Project**

The Watsonville Municipal Airport (WVI) has performed an environmental analysis of the proposed Runway 2-20 Pavement Remarking Project (Project) pursuant to the California Environmental Quality Act (CEQA). This attachment serves as the technical documentation of the CEQA compliance review and evaluates whether the Project qualifies for a CEQA exemption pursuant to a Categorical Exemption (CE).

Statutory Authority and Requirements

CEQA Guidelines Article 19 includes a list of classes and examples of projects, which have been determined not to have a significant effect on the environment, and therefore are exempt for further analysis under CEQA. The Project will be assessed for consistency with the Class 1 CE (CEQA Guidelines Section 15301, Existing Facilities) cited in the Notice of Exemption (NOE).

Pursuant to CEQA Guidelines Section 15061, the analysis will also consider whether the Project is barred from the application of the Class 1 CE by any of the exceptions set forth in CEQA Guidelines Section 15300.2, Exceptions to Categorical Exemptions.

Proposed Project

The Watsonville Municipal Airport intends to repaint the existing pavement markings on Runway 2-20. The current runway markings were last painted in May 2018 but are faded and peeling, creating a safety hazard for aircraft and surface vehicles.

The Project would involve surface painting approximately 55,000 square feet of runway pavement to remark all existing runway markings up to the hold lines on the cross taxiways (see **Figure 1: Project Layout**). The repainted markings will meet FAA P-620 specifications. Staging for construction equipment and worker vehicles would occur on existing pavement near the airport operations building, and haul routes would follow the apron and taxiways onto the runway. The pavement remark activities are anticipated to take one week.

Class 1 CE Consistency Analysis

Class 1 projects consist of the “operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.” The Project mostly closely resembles the following example from CEQA Guidelines Section 15301:

- d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood.

The CEQA Guidelines state that the examples in Section 15301 are not intended to be all-inclusive of project types that may fall within Class 1, and the key consideration is whether the project involves negligible or no expansion of use. Therefore, as the proposed Project would involve restoration of pavement markings on an existing airport runway for public safety purposes and would not change or expand existing uses within the Watsonville Airport, the Project is consistent with the Class 1 CE.

Exceptions to CE Applicability

As previously noted, the applicability of CEs is qualified by the exceptions listed in Section 15300.2(a) through (f) of the CEQA Guidelines. In the discussion below, each exception is followed by an explanation of why the exception does not bar the application of the Class 1 CE.

Location (Section 15300.2(a)): *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particular sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

- The Project has been determined to be eligible for a CEQA exemption pursuant to the Class 1 CE. Therefore, Section 15300.2(a) is not applicable to the Project.

Cumulative Impact (15300.2 (b)): *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

- All proposed remarking activities, including staging and vehicle access routes, would occur on previously disturbed land within the airport property. No construction or operational activities are proposed that would result in significant environmental impacts. Thus, the Project would not contribute to impacts that would be cumulatively significant. Therefore, Section 15300.2(b) is not applicable to the Project.

Significant Effect (15300.2 (c)): *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

- The Project site is highly disturbed and is not located adjacent to sensitive uses. The Project involves repainting runway markings to comply with FAA standards (FAA P-620). The Project therefore would not include activities or risk impacts that are atypical or unique compared to other Class 1-eligible projects. Therefore, Section 15300.2(c) is not applicable to the Project.

Scenic Highways (15300.2 (d)): *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

- According to the California Department of Transportation (Caltrans) State Scenic Highway System Map, there are no officially designated state scenic highways within or near the Project site.¹ Project remarking activities would occur within the boundaries of the existing Airport. Therefore, Section 15300.2(d) is not applicable to the Project.

¹ Caltrans California State Scenic Highways. Available online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed January 9, 2026.

Hazardous Waste Sites (15300.2 (e)): A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

- Based on review of the State Water Resources Control Board GeoTracker database, there are three former leaking underground storage tank (LUST) sites and one military cleanup site associated with the Watsonville Municipal Airport address (100 Aviation Way, Watsonville CA 95076). Each site is listed under a “Completed – Case Closed” status indicating that potential contamination sources have been investigated and remediated to the satisfaction of the Central Coast Regional Water Quality Control Board and the Department of Toxic Substances Control. The Project site does not include any active hazardous materials sites from lists compiled pursuant to Section 65962.5 of the Government Code. Therefore, Section 15300.2(e) is not applicable to the Project.

Historical Resources (15300.2 (f)): A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

- There are three previously recorded cultural resources in the vicinity of the airport: Old Highway 1, which skirts the airport property boundary to the south; and artifacts and a fence associated with a former driving range, which are located south of Old Highway 1 and previously determined not to be eligible for listing on the National Register of Historic Places (NRHP). There are no cultural resources within the airport property that have been determined to be eligible for the NRHP. The proposed remarkable activities would occur on the runway and would not have the potential to affect off-site cultural resources.

Conclusion

As is evidenced by the discussion presented above, the Project is consistent with an exempt project class pursuant CEQA Guidelines Section 15301, Existing Facilities, and no exceptions listed under CEQA Guidelines Section 15300.2 would prevent the application of the Class 1 CE cited in the NOE form. Therefore, the Project would not have a significant effect on the environment and no further environmental analysis is required under CEQA.

Figure 1: Project Layout

