



STATE OF CALIFORNIA  
DEPARTMENT OF FISH AND WILDLIFE

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May 15, 2026

Danielle Green, Interim Director of Public Works & Utilities  
City of Watsonville  
250 Main Street  
Watsonville, CA 95076  
[Danielle.Green@watsonville.gov](mailto:Danielle.Green@watsonville.gov)

**Subject: Crestwood Heights Water Association Water System Consolidation Project, Initial Study/Mitigated Negative Declaration, SCH No. 2026040994, Santa Cruz County**

Dear Danielle Green:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) from the City of Watsonville for the Crestwood Heights Water Association Water System Consolidation Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California Fish and Wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**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.) Similarly, for purposes of CEQA, CDFW 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 as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed 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**

Please be advised that a CESA Permit must be obtained 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. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA

<sup>1</sup> 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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document must specify impacts, mitigation measures, and a 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.

### **Lake and Streambed Alteration**

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for any Project activities that will 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, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. CDFW, as a Responsible Agency under CEQA, would consider the CEQA document for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA (Pub. Resources Code § 21000 et seq.) as the Responsible Agency.

### **Raptors and Other Nesting Birds**

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

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** City of Watsonville

**Objective:** The objective of the Project is to provide the community of Crestwood Heights with safe and reliable drinking water. The Project involves consolidation of the Crestwood Heights Water Association water system with the City of Watsonville municipal water system. Improvements include installation of new water mains, service laterals, and meters for approximately 45 residences, system interties, and removal of existing water system infrastructure. In total, the proposed project would include 7,000 linear feet (1.33 miles) of new pipelines. The proposed project would install water mains within the right-of-way of Lakeview Road, Cambridge Drive, Kingston Drive, Oxford Drive, Strafford Drive, and Crestwood Drive. The proposed project also involves preparing a Drinking Water State Revolving Fund application to assist in funding construction of the proposed project.

**Location:** The Project is located outside of the eastern boundary of the City of Watsonville. The Project components are primarily within the Lakeview Road right-of-way, with some components located in the Crestwood Heights community of unincorporated Santa Cruz County. Regional access to the Project site is provided from State Route 129/Riverside Road and College Road.

**Timeframe:** Construction is expected to begin as early as 2027 and is to occur over the course of approximately 10 months.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist City of Watsonville in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

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## I. Environmental Setting and Related Impact Shortcoming

### COMMENT 1: Potential Impacts to Riparian Habitat

**Issue:** The IS/MND identifies impacts to 0.17 acre of riparian habitat adjacent to Salsipuedes Creek. The IS/MND also indicates trenching would occur within existing roadways and developed areas. Construction adjacent to riparian habitat and creek corridors may result in direct or indirect impacts to the bed, bank, channel, or associated riparian habitat through vegetation disturbance, erosion/sediment runoff, staging, dewatering, or other ground-disturbing activities.

**Recommendation:** CDFW recommends the Project notify CDFW for a LSA Agreement prior to construction, for work affecting riparian habitat and where work activities could impact stream resources. A complete LSA Notification should include detailed information describing the extent of project activities occurring within or adjacent to riparian and aquatic resources.

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would 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 IS/MND to assist 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](mailto:Alexis.Harrison@Wildlife.ca.gov); or Wes Stokes, Senior Environmental Scientist (Supervisory), at [Wesley.Stokes@wildlife.ca.gov](mailto:Wesley.Stokes@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Erin Chappell*  
B77E9A6211EF486...  
Erin Chappell  
Regional Manager  
Bay Delta Region

ec: Office of Land Use and Climate Innovation, State Clearinghouse (SCH No. 2026040994)  
Craig Weightman, CDFW Bay Delta Region - [Craig.Weightman@wildlife.ca.gov](mailto:Craig.Weightman@wildlife.ca.gov)