

Final

# WATSONVILLE SLOUGH SYSTEM MANAGED AQUIFER RECHARGE AND RECOVERY PROJECTS

## Responses to Comments on the Draft Supplemental Environmental Impact Report

Prepared for

January 2021





# **WATSONVILLE SLOUGH SYSTEM MANAGED AQUIFER RECHARGE AND RECOVERY PROJECTS**

## **Responses to Comments on the Draft Supplemental Environmental Impact Report**

**Prepared for  
Pajaro Valley Water Management  
Agency**

**January 2021**

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# CHAPTER 1

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## Introduction to Responses to Comments

### 1.1 Purpose of the Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Supplemental Environmental Impact Report (DEIR) for the proposed Harkins Slough Facilities Upgrades Project (Harkins Slough Project) and the proposed Struve Slough Project (collectively called the Watsonville Slough System Managed Aquifer Recharge and Recovery Projects, or Projects), to respond in writing to comments on environmental issues, and to revise the DEIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resource Code Sections 21091(d)(2)(A) and (B), the Pajaro Valley Water Management Agency (PV Water) has considered the comments received on the DEIR, evaluated the issues raised, and is providing written responses that address each substantive environmental issue that has been raised by the commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the Projects. In addition, this RTC document includes text changes to the DEIR initiated by PV Water and consultant staff.

None of the comments received provide new information that warrants recirculation of the DEIR. The comments do not identify new significant impacts or a substantial increase in the severity of previously identified impacts or feasible project alternatives or mitigation measures that are considerably different from those analyzed in the DEIR and/or that the project sponsor has not agreed to implement.

The DEIR together with this RTC document constitutes the Final EIR for the Projects in fulfillment of CEQA requirements consistent with CEQA *Guidelines* Section 15132. The Final EIR has been prepared in compliance with CEQA, including the CEQA *Guidelines*. It is an informational document for use by (1) governmental agencies and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the Projects and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) PV Water's Board of Directors (the Board) where applicable prior to their decision to approve, disapprove, or modify the Projects.

This RTC document provides written responses to all substantive comments received during the public review period. It contains the following: (1) a list of persons, organizations, and public agencies commenting on the DEIR; (2) copies of comments received on the DEIR; (3) written responses to those comments; and (4) revisions to the

DEIR to clarify or correct information in the DEIR. See Section 1.3, below, for a description of the overall contents and organization of this RTC document.

## **1.2 Environmental Review Process**

### **1.2.1 Notice of Preparation and Public Scoping**

PV Water sent a Notice of Preparation (NOP) to governmental agencies, organizations, and persons interested in the Projects on May 31, 2019 (see DEIR Appendix NOP). During the public scoping period that ended on July 1, 2019, PV Water received four written comments from agencies and interested parties identifying environmental issues that should be addressed in the EIR. The comment letters received in response to the NOP are included in DEIR Appendix NOP. In addition, a public scoping meeting was held on Wednesday, June 12, 2019 in the Community Room at the City of Watsonville Civic Plaza (275 Main Street, Fourth Floor Watsonville, California) to receive comments on the scope of the EIR. PV Water considered all comments made by the public and agencies during the scoping period in preparing the EIR on the Projects.

### **1.2.2 DEIR Public Review**

The DEIR was published on September 1, 2020 and circulated to local, state, and federal agencies and to interested organizations and individuals for their review and comment. The public review period for the DEIR started on September 1, 2020 and ended on October 19, 2020. Paper copies of the DEIR were made available for public review by appointment at PV Water's office, 36 Brennan Street, Watsonville, California.

Electronic copies of the DEIR could be accessed through the internet on PV Water's website, Watsonville Slough System Managed Aquifer Recharge and Recovery Projects webpage at the following address: <https://www.pvwater.org/wss-marr>. PV Water also distributed notices of availability of the DEIR to interested parties and published notification of its availability in the *Santa Cruz Sentinel* and *The Pajaronian*.

During the public review period, PV Water held an informational public meeting to answer questions on the DEIR. The public meeting was held on September 23, 2020 via the GoTo™ online meeting platform. During the DEIR public review period, PV Water received comments from public agencies, organizations, and private individuals. See Chapter 2, *List of Persons Commenting*, for a complete list of persons, agencies, and organizations commenting on the DEIR.

### **1.2.3 Responses to Comments Document and Final EIR**

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written comments on the DEIR. Under CEQA *Guidelines* Section 15201, members of the public may comment on the Projects. Further, CEQA *Guidelines* Section 15204(a) states that the focus of public review should be “on the sufficiency of the [DEIR] in identifying and analyzing the possible impacts on the



environment and ways in which the significant effects of the project might be avoided or mitigated.” In addition, “when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” CEQA *Guidelines* Section 15088 specifies that the lead agency is required to respond to the comments on the major environmental issues raised in the comments received during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the DEIR in disclosing the significance of the environmental impacts of the Projects that were evaluated in the DEIR.

PV Water distributed this RTC document for review to the Board, as well as to the agencies, organizations, and individuals who commented on the DEIR. The Board will consider the adequacy of the Final EIR—consisting of the DEIR and this RTC document—in complying with the requirements of CEQA. If the Board finds that the Final EIR complies with CEQA requirements, it will certify the Final EIR as adequate under CEQA.

If the Final EIR is certified, the Board will then review and consider the Final EIR before making a decision to approve the Projects. If the Board decides to approve the Projects, it will adopt CEQA findings, including adopting or rejecting mitigation measures and alternatives to avoid or reduce significant impacts, and a mitigation monitoring and reporting program (MMRP). Consistent with CEQA *Guidelines* Section 15097, the purpose of the MMRP is to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the Project’s significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA *Guidelines* Sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels and the Projects are approved, the findings must include a statement of overriding considerations for those impacts (CEQA *Guidelines* Section 15093(b)).

## 1.3 Document Organization

Subsequent chapters of this RTC include the following:

- **Chapter 2, *List of Persons Commenting*.** This chapter lists the persons, agencies, and organizations that submitted comments on the DEIR and describes the coding and organization of comments.
- **Chapter 3, *Responses to Comments Received on the DEIR*.** This chapter presents the substantive comments received on the DEIR together with responses to those comments.
- **Chapter 4, *DEIR Revisions*.** This chapter presents changes and additions to the DEIR. PV Water has made changes and additions to the DEIR in response to comments received on the DEIR and/or as necessary to clarify statements and

conclusions made in the DEIR. In all cases, changes and additions are provided to clarify or correct content in the DEIR or to add information received after the release of the DEIR. None of the changes or additions in Chapter 4 affect the conclusions presented in the DEIR.

- ***Appendix COM.*** This appendix includes full copies of the written comments received on the DEIR. Appendix COM also shows, in the margin of each letter, the bracketing and comment code used to identify comments and the corresponding response code.

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## CHAPTER 2

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### List of Persons Commenting

This Responses to Comments (RTC) document provides written responses to comments received on the Draft Supplemental Environmental Impact Report (DEIR) during the public review period. This chapter lists all persons who submitted comments on the DEIR, as shown in **Table RTC 2-1**. The complete set of comments received on the DEIR is contained in **Appendix COM**.

The commenter codes were assigned to facilitate the preparation of responses, and there is a unique commenter code for each comment letter and email based on the name of the agency, organization, or individual submitting the comment. The commenter code is an acronym or name for the agency or organization, and commenters are listed in alphabetical order by code.

Each individual comment from each commenter is bracketed and numbered sequentially following the commenter code. The bracketed comments and corresponding comment numbers are shown in the margins of the comments in Appendix COM. There is a unique comment number for each distinct substantive comment.

**TABLE RTC 2-1**  
**PERSONS COMMENTING ON THE DEIR**

| <b>Commenter Code</b> | <b>Name and Title of Commenter</b>                  | <b>Agency/Organization</b>          | <b>Date Received</b> |
|-----------------------|---|-------------------------------------|----------------------|
| LTSCC                 | Bryan Largay, Conservation Director                 | Land Trust of Santa Cruz County     | October 2, 2020      |
| MBARD                 | Hanna Muegge, Air Quality Planner                   | Monterey Bay Air Resources District | October 19, 2020     |
| WWW                   | Donna Bradford, President of the Board of Directors | Watsonville Wetlands Watch          | October 19, 2020     |

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## **CHAPTER 3**

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# **Responses to Comments Received on the DEIR**

### **3.1 Land Trust of Santa Cruz County**

#### **Comment LTSCC-1**

“This is an important project. Among the greatest threats to agricultural viability is sea water intrusion, and the proposed project is a cost effective approach to addressing that issue. We provide a couple comments below about agricultural land protection.

Our wetlands, riparian forests and coastal grasslands are also enormously productive from the perspective of biodiversity and ecosystem services such as improving water quality. The project as proposed does a good job of minimizing impacts to these ecosystems, although we also present a few comments below requesting consideration and clarification on this topic.”

#### **Response LTSCC-1**

This comment is acknowledged and appreciated.

#### **Comment LTSCC-2**

“Overall we are comfortable with the potential for hosting the Struve Slough Pump Station on our ranch, as described in the Land Trust Property Alternative. That property is called Watsonville Slough Farm.

Overall we are comfortable with hosting the approximately one-half mile long segment of the Struve Slough to Filter Plant Pipeline that would cross the Bryant Habert portion of Watsonville Slough Farm. Those lands were sold to us at a discount by the Bryant and Habert families with the request that the lands be used to increase the viability of agriculture in the region, and for habitat enhancement. Hosting the pipeline will directly advance that goal. However, on both the intake and pipeline components of the project we have a few comments as presented below.”

## Response LTSCC-2

PV Water appreciates the willingness of the Land Trust of Santa Cruz County (Land Trust) to host the Project components (Struve Slough pump station and Struve Slough to filter plant pipeline) on its land. PV Water will continue discussions with both the Land Trust and the property owners of the sites proposed in the Draft Environmental Impact Report (DEIR) to determine where the Struve Slough pump station and associated pipelines would be constructed. As indicated in DEIR Section 5.4, Comparison of Project Alternatives and Environmentally Superior Alternative, there is little overall difference between the impacts of the Projects and the Struve Slough Pump Station on Land Trust Property Alternative described in DEIR Chapter 5, *Alternatives*. Implementing the Project on the Land Trust Property would incrementally reduce the potential for adverse effects on special status species during construction while increasing the loss of Important Farmland by approximately 0.05 acre. No new mitigation measures would be required if PV Water were to construct the pump station on the Land Trust Property; Mitigation Measure LU-1a, Compensate for Conversion on Important Farmland, would apply to the Struve Slough pump station site.

## Comment LTSCC-3

“At the water intakes, solids from the slough water column will accumulate on the intake filter screen. At the intake pump station, solids that pass through the intake filter screen may accumulate if additional filtration is performed. Both of these filtration steps would generate a filter cake or collection of solids that will need to be addressed. In our reading of the document, we did not come to an understanding of the strategy for addressing these accumulated solids. The volume may be considerable, and it is important that they be addressed in a manner that minimizes environmental impacts. If the alternative intake site, located on Land Trust property, is selected, managing this material may have impacts to farming and other operations on Land Trust property. These should be characterized.”

## Response LTSCC-3

The comment infers that solids would accumulate on the intake filter screens; however, due to the design of the screens, solids would not accumulate on the screens. As shown on DEIR Figure 2-12, PV Water would install cone screens, which are equipped with brushes that periodically sweep the screens of debris and other solids. Solids that are able to pass through the intake filter screen would be very small (likely 1.75 millimeter size) and would get pumped into the intake pipeline or accumulate at the pump station. Any solids that build up in the wet well of the pump station would be infrequently collected (every 3 to 5 years) via a vacuum truck and properly disposed of offsite.

## Comment LTSCC-4

“Nighttime security lighting is proposed for the intake site. Lighting will impact wildlife and the rural character of the site. Such lighting should be on motion sensors

and timers to avoid illumination that is unnecessary for security, and thereby reducing environmental impacts. Cones and hoods should be included so as to not illuminate areas outside the facilities.”

#### **Response LTSCC-4**

As indicated in DEIR Section 2.7, Operations and Maintenance, and Impact AES-3 in Section 3.13, Aesthetics, exterior nighttime security lighting is proposed at the Struve Slough screened intake and pump station. Because the lighting would be required to comply with the California Green Building Standards Code (including shielded lights or “cutoff” standards), the amount of light that could extend beyond property boundaries would be limited. While the new exterior lighting at the Struve Slough may be visible from the nearby residences, new lighting sources are not expected to substantially increase ambient light in the Project area. During final design, PV Water will evaluate the use of sensor and timed security lighting at the pump station as suggested by the commenter.

Additionally, Impact BR-1 in DEIR Section 3.4, Biological Resources, addresses the potential for increased lighting associated with construction to alter California red-legged frog (CRF) and western pond turtle (WPT) behavior in ways that would result in injury mortality. In general, construction would take place during daytime hours, and would not require construction lighting. Construction-related lighting would be temporary in duration and limited to the entry/exit pit sites (for trenchless pipeline construction), in agricultural and ruderal habitats. Implementation of Mitigation Measure AES-1, Construction Lighting, would require PV Water or its contractor to use shielded and hooded outdoor construction lighting directed to the area where the lighting would be required to minimize ambient light during Project construction, thereby reducing potential impacts to wildlife related to construction lighting to a less-than-significant level.

#### **Comment LTSCC-5**

“Segments of the proposed pipeline are proposed to cross Land Trust property for about a half mile in the area east of where it crosses the railroad tracks. Portions of this property have been restored for wetland restoration. Crossings of this restored habitat may necessitate trenchless construction. These wetlands typically dry completely each fall, but the water table is very shallow, potentially complicating construction. Wetland and grassland restoration areas may tolerate trenching and rehabilitation, but considerable care must be exercised.”

#### **Response LTSCC-5**

PV Water contacted the Land Trust to discuss this and other comments on November 3, 2020. PV Water will, in accordance with Mitigation Measure BIO-1c, realign the Struve Slough to filter plant pipeline to avoid the willow riparian forest at location SW1 (refer to Figure

BIO-1e in Draft EIR Appendix BIO). If the revised pipeline alignment crosses the referenced Land Trust parcel, PV Water commits to a narrower temporary construction corridor (i.e., approximately 20 feet instead of 40 feet), requiring a minimum of five feet of cover for the pipeline, and implementing design features to preclude pipe bedding from acting as a drainage conduit for restored wetlands. Refer to revisions to Mitigation Measure BIO-1c presented in Chapter 4, *DEIR Revisions*.

#### **Comment LTSCC-6**

“The Watsonville Slough Conservation and Enhancement Plan (2003) envisions restoration of wetland habitat along the Watsonville Slough channel and construction of a separate agricultural drainage channel in proximity to where the Struve Slough to Filter Plant Pipeline crosses Watsonville Slough. In order to not preclude this future restoration and agricultural drainage water project, the pipeline in this area should be installed below the likely bed elevation of anticipated wetland restoration or agricultural drainage channel project, with sufficient cover to minimize conflict between the two projects. From our experience with wetland restoration and agricultural drainage management in the area, we expect that the bed of such features would be no lower than an elevation of 5.0 feet NGVD.”

#### **Response LTSCC-6**

As noted in Response LTSCC-5, PV Water contacted the Land Trust to discuss this and other comments on November 3, 2020. As indicated in DEIR Section 2.6.6.1, the minimum depth of cover above the pipeline in agricultural fields would be five feet. In response to this comment, PV Water will commit to a minimum depth of cover above the pipeline through Bryant Habert parcel as well (refer to revisions to Mitigation Measure BIO-1c presented in Chapter 4, *DEIR Revisions*). Based on LiDAR data, ground elevation along the pipeline alignment shown in the DEIR is approximately 9 to 10 feet NAVD88 within the Bryant Habert parcel. With 5 feet of cover, the elevation of the top of the pipeline would be at approximately 4 to 5 feet NAVD88. This depth is expected to provide sufficient cover to avoid conflicts with typical farming operations (such as tilling and ripping), and would accommodate wetland restoration as described in the comment.

#### **Comment LTSCC-7**

“The Watsonville Slough Farm Management Plan (2012) includes an array of habitat restoration projects. Many of these have been implemented, but a number remain outstanding, and could serve as mitigation project sites for the proposed project. We are willing to engage with PV Water about this potential. Our property was acquired with grant funds from the California State Coastal Conservancy and Wildlife Conservation Board. Approval from those entities will be required as a precondition of any mitigation projects.”



### Response LTSCC-7

PV Water looks forward to future discussions with the Land Trust regarding the siting of compensatory habitat implemented for the Projects in response to Mitigation Measures BR-1b, BIO-1b, or BIO-1c.

### Comment LTSCC-8

“The proposed project includes impacts to agriculture. The 240 acres of farmland on Watsonville Slough Farm is at risk from seawater intrusion and other impacts to its water supply. Connecting this property to the Coastal Distribution System would be a significant boost to the viability of this farmland. That connection has been conceptually designed by PV Water but has not been implemented. As part of the proposed project, connecting this farmland to the Coastal Distribution System would be cost effective, using the same trenches and equipment mobilization as for the proposed project. Perhaps that connection, which would be a substantial benefit to agricultural viability, could serve in part as mitigation for impacts to agricultural land by the proposed project.”

### Response LTSCC-8

This comment is acknowledged. The DEIR evaluates the Projects’ adverse impacts on agriculture in Section 3.2, Land Use and Agricultural Resources; Mitigation Measures LU-1a (Compensate for Conversion of Important Farmland) and LU-1b (Replacement of Topsoil) address both short- and long-term effects. The planned expansion of the Coastal Distribution System (CDS) is based on overall benefit to the Pajaro Valley Groundwater Basin and how expansion of the delivered water service area can best meet the goal of reducing and eventually eliminating seawater intrusion. In this manner, the proposed Projects would help to protect the Watsonville Slough Farm from the adverse consequences of seawater intrusion. While farmland adjacent to the coast is priority for expanding the CDS, PV Water will consider this request during planning for future expansions.

## 3.2 Monterey Bay Air Resources District

### Comment MBARD-1

“Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments:

#### *AIR-1 Air Quality Impacts and Mitigation Measures*

To further reduce construction-related emissions including odors and short-term diesel particulate matter, the Air District recommends using construction equipment which conforms to the Air Resources Board’s Tier 3 or Tier 4 emission standards.

Where feasible, construction equipment should use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

For architectural coatings used in the project, Air District Rule 426 may apply. Please contact the Air District's Engineering Division for more information at (831) 647-9411."

### **Response MBARD-1**

This comment is acknowledged. As indicated in Impact AIR-1 in DEIR Section 3.5, Air Quality and Greenhouse Gases, the maximum daily construction emissions of ROG, NOx, PM10, and PM2.5 would not exceed Monterey Bay Air Resources District (MBARD) significance thresholds for construction. The 2014 BMP Update PEIR included adopted Mitigation Measure AQ-1 to reduce fugitive dust emissions from construction activities, which would be implemented as part of the Projects and would further reduce fugitive PM emissions by approximately 35 percent. The Projects would result in emissions less than the quantitative thresholds of significance during both construction and operation, and the impact was determined to be less than significant.

As indicated in Impact AIR-2, increase in lifetime cancer risk and non-cancer hazard index from exposure to construction diesel particulate matter emissions would be less than the respective MBARD thresholds; consequently, this impact was also determined to be less than significant. Impact AIR-3 concludes that construction activities could result in temporary odors from use of diesel-fueled equipment, but diesel combustion odors would be temporary, would dissipate quickly, and are unlikely to create objectionable odors that would affect a substantial number of people. PV Water will comply with all applicable MBARD regulations during construction and operation of the Projects.

## **3.3 Watsonville Wetlands Watch**

### **Comment WWW-1**

"1. Mitigation Measure BIO-1d and other mitigation measures discuss the proposed measures to mitigate for both temporary and permanent loss of wetlands. We greatly value the work of the NRCS and the Santa Cruz RCD in advancing critical wetland preservation and restoration efforts in the Watsonville Slough System. If the documents is to list partners for mitigation work, we request that you also list Watsonville Wetlands Watch, as our organization has been actively working on environmental restoration work within the slough system for over 20 years and is interested to explore ways to advance and implement mitigation measures should they be determined to be required by the project permitting agencies.

We feel however, more important than listing local partners is to clearly articulate that all mitigation work, such as replacement of riparian or wetland habitat, will be performed within the Watsonville Slough System. While we have a preference for

onsite mitigation, we would request that all off-site mitigation be conducted within the Watsonville Slough System. Given the potentially significant impacts that this project will have on the slough system, we feel that this is an important measure. We would also request that a Habitat Mitigation and Management Plan be developed to support implementation of this measure and that the development of this plan be listed as a mitigation measure. We would request the opportunity for our organization to support the development of this plan in conjunction with other local, State, or federal agencies and we would look forward to partnering with the agency to determine an achievable path forward to implement the work the Habitat Mitigation and Management Plan.”

### **Response WWW-1**

In response to Comment WWW-1, revised adopted Mitigation Measures BIO-1c and BIO-1d have been further revised to specify that PV Water may choose to coordinate with Watsonville Wetlands Watch (WWW), and that, to the extent practical, off-site mitigation for wetlands occur within the Watsonville Slough system. Refer to Chapter 4, *DEIR Revisions*, for revisions to the mitigation measures.

Revised adopted Mitigation Measures BIO-1c and BIO-1d currently include requirements for preparation of a revegetation plan, which would need to be approved by the regulatory agencies listed in the measures. This revegetation plan is intended to serve the same function as a Habitat Mitigation and Management Plan. Mitigation Measures BIO-1c and BIO-1d describe the elements of the revegetation plans as including the use of locally obtained plant materials, detailed descriptions of installation methods, after-installation care, weed control measures, success criteria, and corrective measures if the success criteria are not met. WWW’s request to support PV Water with the preparation of the revegetation plan is acknowledged and appreciated.

### **Comment WWW-2**

“2. The project identifies a potential loss of 11.9 acres of wetland habitat within Harkins Slough and 3.6 acres within Struve Slough. Please clarify that mitigation for resulting loss of wetlands will be included within mitigation measures to be mitigated at a 3:1 ratio. The current mitigation measures appear to not clearly state to us how these impacts will be mitigated, such as in Bio-1d and BR-1c. As in our comment above, we request that this work be done either on site or as off-site compensatory mitigation within the Watsonville Slough System. As per our comment above, we request that this work be implemented in accordance with the Habitat Restoration and Management Plan.”

### **Response WWW-2**

Implementation of Mitigation Measure BIO-1d (presented on DEIR page 3.4-11 in Section 3.4, Biological Resources) includes a 3:1 replacement ratio, a revegetation plan,

and a preference for placing mitigation sites within the Watsonville Slough System. Please refer to Response WWW-1 and Chapter 4, *DEIR Revisions*, for edits to Mitigation Measures BIO-1c and BIO-1d.

### **Comment WWW-3**

“3. The DEIR discusses the plan and need for an Adaptive Management Plan. The DEIR makes many assumptions about the potential impacts of the project on wetlands and wildlife and while we assume that these represent the best available science, we also recognize that environmental conditions and other land use changes will change over time. An Adaptive Management Plan is important to ensuring that the use of water in the slough system is guided by a plan which can guide management of infrastructure associated with this project in a way that minimizes impacts to wildlife and wetland resources over time and supports best management of the slough system overall for the many important uses including this project. We feel that given the potential impacts it would be appropriate to specify that the Adaptive Management Plan would be implemented as a part of a mitigation measure for the project, such as BIO-1d, or otherwise stated in such a way as to represent a commitment to complete this important document. Please also clarify the timeline for completion of such a plan. We would request to serve as a technical advisor for this plan.”

### **Response WWW-3**

The reference to an Adaptive Management Plan (AMP) in the Cumulative Effects discussion under Impact C-BR-1 in DEIR Section 3.4, Biological Resources, was included by error and is revised in Chapter 4, *DEIR Revisions*. Regardless, the discussion of impacts to waterfowl are currently addressed under Impact BR-7, and an AMP for waterfowl was deemed unnecessary because impacts to migratory birds, including waterfowl, were determined to be less than significant. As described under Impact BR-7 (in discussion of MBTA-protected birds), the post-project lower water surface elevation (WSE) in the Watsonville Slough complex will result in shallower open water levels closer to those that were present 40 years ago, prior to the increased deposition of sediment from adjacent and expanding agricultural lands. Rising WSE over the last several decades has resulted in deeper aquatic habitat and expansion of water smartweed, which has resulted in a decrease in habitat quality for waterfowl. Although the area of open water habitat will decrease in the sloughs, this decrease is expected to be offset by improvements in waterfowl habitat in the remaining open water habitat. The impact conclusion for Impact BR-4 is that BIO-1d would reduce operational impacts to wetlands (see Response WWW-2, above) to less than significant with mitigation. In regard to impacts to California red legged frog wetland habitat, the analysis under Impact BR-1 includes Mitigation Measure BR-1b, Compensate for Temporary and Permanent Impacts to CRF Habitat, which requires restoration, enhancement or creation of CRF wetland habitat, 5 years of monitoring and identification of remedial actions as needed to achieve the minimum 3:1 habitat replacement ratio for permanent impacts to CRF habitat, similar to an AMP.

**Comment WWW-4**

“We want to once again thank the Pajaro Valley Water Management Agency for your stewardship of groundwater and water resources in the Pajaro Valley and your careful operations of current infrastructure within the slough system. We are interested to support outcomes related to best management of wildlife and wetland habitat and natural resources and the planning for these efforts. Please don’t hesitate to reach out to our Executive Director, Jonathan Pilch, for support and consultation during this process.”

**Response WWW-4**

This comment is acknowledged. PV Water appreciates the good work WWW does within the community, as well as the continued participation of WWW staff in PV Water’s Projects and Facility Operations Committee, Ad Hoc Sustainable Groundwater Planning Advisory Committee, Board meetings, public meetings, etc., and will continue to keep the organization informed on opportunities to provide input on the Projects.

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# CHAPTER 4

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## DEIR Revisions

### 4.1 Introduction

This chapter presents revisions to the Draft Supplemental Environmental Impact Report (DEIR) for the Watsonville Slough System Managed Aquifer Recharge and Recovery Projects (Projects) that was published on September 1, 2020. These revisions include both (1) changes made to text, tables, or figures in response to comments on the DEIR as discussed and presented in Chapter 3, as well as (2) staff-initiated text changes to correct minor inconsistencies, to add minor information or clarification related to the project, and to provide updated information where applicable. None of the revisions or corrections in this chapter substantially change the analysis and conclusions presented in the DEIR.

The chapter includes all revisions by reproducing the relevant excerpt of the DEIR in the sequential order by the chapter, section, and page that it appears in the document. Preceding each revision is a brief explanation for the text change, either identifying the corresponding comment codes, such as Comment WWW-1, where the issue is discussed in Chapter 3, or indicating the reason for a staff-initiated change. Deletions in text and tables are shown in bold and strikethrough (~~strikethrough~~) and new text is shown in double-underline (double-underline). Text that was revised in adopted mitigation measures in the DEIR is indicated with single underlining (single-underline) where text was added, and strikethrough (~~strikethrough~~) where text was deleted.

### 4.2 Changes to the DEIR

#### 4.2.1 Cover, Table of Contents, Acronyms, Abbreviations, Glossary, and Summary

No revisions were made to these chapters.

#### 4.2.2 Chapter 1, Introduction

No revisions were made to this chapter.

#### 4.2.3 Chapter 2, Project Description

No revisions were made to this chapter.

## 4.2.4 Chapter 3, Environmental Setting, Impacts, and Mitigation Measures<sup>1</sup>

Revisions were made to this chapter in the following sections only:

### Section 3.3, Surface Water, Groundwater, and Water Quality

Staff-initiated changes were made to revise Mitigation Measures HWQ-4 in Table 3.3-5 on page 3.3-34 as follows:

HWQ-4: Facilities shall be designed ~~designated~~ to comply with FEMA and County of Santa Cruz requirements to flood-proof the facilities and shall not exacerbate upstream or downstream flood hazards on other properties. The FEMA process will require identification of the FEMA floodway zone and may require no increase water elevations for a one percent chance annual flood. The FEMA process will require identification of the FEMA zone type and may require no increase water elevations for a one percent chance annual flood. To meet the specific FEMA requirements for the component, substantial modifications to the facility design and additional mitigation may be required.

Staff-initiated changes were made to revise the text under Impact HYD-4 on page 3.3-50 as follows:

The Projects would increase the rate of water drawdown in Struve Slough, generally when the water surface elevation is between 6 to 8 feet NAVD88 in Struve Slough. However, as described under Impact HYD-2, ~~Rapid~~ changes in water surface elevation in Struve Slough would not oscillate over a wider range of elevations than under existing conditions and therefore would not be expected to ~~may~~ increase slumping of the banks along the slough, ~~which could in turn affect hydrology in the slough system by decreasing the capacity of Struve Slough, similar to ongoing geomorphologic changes described in Section 3.3.1.2. However, the Projects would also remove water from the sloughs system, which may counteract hydrologic effects of increased sedimentation in Struve Slough. Implementation of adopted Mitigation Measure HWQ-2 would reduce this impact by developing criteria to minimize fluctuations and protecting banks from~~ Consequently, there would be no substantial change in erosion due to ~~rapid,~~ imposed water-level fluctuations ~~in Struve Slough. With implementation of adopted Mitigation Measure HWQ-2, and~~ this impact would be *less than significant*.

<sup>1</sup> Deletions in text and tables are shown in bold and strikethrough (~~strikethrough~~) and new text is shown in double-underline (double-underline). Text that was revised in adopted mitigation measures in the DEIR is indicated with single underlining (single-underline) where text was added, and strikethrough (~~strikethrough~~) where text was deleted



## Section 3.4, Biological Resources

In response to Comment WWW-1, DEIR Mitigation Measure BIO-1c on DEIR pages 3.4-43 and 3.4-44 is revised as follows:

### Mitigation Measure BIO-1c (Revised):

During design, PV Water will realign the Struve Slough to filter plant pipeline to avoid the willow riparian forest at location SW1 within the Bryant Habert property, owned by the Land Trust of Santa Cruz County (Land Trust). If the revised pipeline alignment crosses the referenced parcel, PV Water commits to a narrower construction corridor (i.e., 20 feet instead of 40 feet), requiring a minimum of five feet of cover for the pipeline, and implementing design features to preclude pipe bedding from acting as a drainage conduit for restored wetlands. Where construction impacts ~~on mixed riparian or~~ willow riparian forest will otherwise occur, revegetation and restoration measures will be developed as part of a revegetation plan approved by CDFW, RWQCB, and if applicable, USACE, Santa Cruz County, and/or California Coastal Commission, pursuant to regulatory agency permitting. The revegetation plan will include specific plans for the revegetation and restoration of impacted willow riparian forest, and for restoration of nearby creek riparian habitat, as appropriate. No trees will be placed above pipelines. Upon approval by Santa Cruz County and other applicable agencies, PV Water the PVWMA may choose to coordinate with the Natural Resources Conservation Service, ~~(NRCS)~~ and the Santa Cruz County Resource Conservation District (RCD), and Watsonville Wetlands Watch to develop and implement the required riparian-revegetation, including providing funds to the RCD for their implementation of the revegetation. Revegetation measures will include the use of locally obtained plant materials, detailed descriptions of installation methods, after-installation care, weed control measures, success criteria, and corrective measures if the success criteria are not met. Temporarily impacted areas will be restored to pre-construction conditions with equivalent or greater habitat quality. Revegetation will include a 3:1 replacement ratio of the acreage of willow riparian forest habitat lost and for all trees lost as result of the Project to account for the reduced habitat values of smaller trees compared with mature vegetation. Success criteria for replanting will be less than 20 percent mortality of individual species annually yearly for 5 years. Replanting will be conducted each year that plantings exceed 20 percent-% mortality, such that 80 percent-% plant survival is maintained each year of the 5-year monitoring period. Cover provided by invasive, non-native plant species shall not exceed 5 percent-% during each year of the 5-year monitoring period. Mitigation may occur via restoration, creation, or preservation of wetlands or waters. Mitigation will occur at a site acceptable to permitting agencies and pursuant to the Project's permit requirements, and to the extent practical, at a site within the Watsonville Slough system. If the compensatory mitigation includes restoration, enhancement, or creation of wetlands or waters, a qualified biologist will monitor the designated wetland mitigation area for a minimum of five years to ascertain if the wetland mitigation is successful. Annual reports will be submitted to permitting agencies by December 31 of each monitoring year, describing the results of the

monitoring and any remedial actions needed to achieve a minimum 3:1 habitat replacement ratio or equivalent for permanent impacts on willow riparian forest.

In response to Comment WWW-1, DEIR Mitigation Measure BIO-1d on DEIR page 3.4-44 is revised as follows:

**Mitigation Measure BIO-1d (Revised):**

Where construction or operational impacts on open water (creeks, streams-sloughs, jurisdictional ditches), agricultural wetlands, or coastal freshwater marsh occurs, revegetation and restoration measures will be developed as part of a revegetation plan approved by CDFW, RWQCB, USACE, Santa Cruz County and/or California Coastal Commission, pursuant to regulatory agency permitting. Upon approval by ~~Santa Cruz County~~ and other applicable agencies, PV Water ~~the PVWMA~~ may choose to coordinate with the Natural Resources Conservation Service, ~~(NRCS)~~ and the Santa Cruz County Resource Conservation District (RCD), and Watsonville Wetlands Watch to develop and implement the required wetland revegetation and restoration, including providing funds to the RCD for their implementation of the revegetation and restoration. The revegetation plan will include specific plans for the revegetation of impacted ~~coastal marsh wetlands~~, and for restoration of nearby wetland habitat, as appropriate. Revegetation measures will include the use of locally obtained plant materials, detailed descriptions of installation methods, after-installation care, weed control measures, success criteria, and corrective measures if the success criteria are not met. Temporarily impacted areas will be restored to pre-construction conditions with equivalent or greater habitat quality. Revegetation will include a 3:1 replacement ratio (or an equivalent habitat replacement strategy as agreed upon by PV Water ~~PVWMA~~ and regulatory agencies) for impacted wetlands. If natural recovery is a viable strategy, then a wetland plant cover exceeding 50 percent % should be attained after two growing seasons. Mitigation may occur via restoration, creation, or preservation of wetlands or waters. Mitigation will occur at a site acceptable to permitting agencies and pursuant to the Project's permit requirements and, to the extent practical, at a site within the Watsonville Slough system. If the compensatory mitigation includes restoration, enhancement, or creation of wetlands or waters, a qualified biologist will monitor the designated wetland mitigation area for a minimum of five years to ascertain if the wetland mitigation is successful. Annual reports will be submitted to permitting agencies by December 31 of each monitoring year, describing the results of the monitoring and any remedial actions needed to achieve a minimum 3:1 habitat replacement ratio or equivalent for permanent impacts ~~on wetlands and other waters.~~

Staff-initiated changes were made to revise the text under *Impact Conclusion* on page 3.4-49 as follows:

Implementation of revised adopted Mitigation Measure BIO-1d, presented under Impact BR-2, would effectively reduce operational impacts to ~~CRF~~ wetlands to less than significant with mitigation

In response to Comment WWW-3, the third paragraph on DEIR page 3.4-61 is revised as follows:

As discussed in Impact BR-4, project operation would result in lower WSE and habitat conversion at Harkins Slough and Struve Slough resulting in a small shift downslope in the upper limit of wetland conditions, combined with an increase in the WSE range that will support wetland conditions over time, in the sloughs. As discussed in Impact BR-45, the Projects would implement revised adopted Mitigation Measure BIO-1de to reduce ~~impacts on~~ operational impacts on ~~sensitive natural communities and~~ jurisdictional wetlands. Revegetation and restoration measures will be developed as part of a revegetation plan approved by CDFW, RWQCB, USACE, Santa Cruz County and/or California Coastal Commission, pursuant to regulatory agency permitting. Revegetation will include a 3:1 replacement ratio (or an equivalent habitat replacement strategy as agreed upon by PV Water and regulatory agencies) for impacted wetlands. This measure would avoid or minimize the Project's operational impacts on wetlands such that the Project's contribution to the cumulative impacts would not be cumulatively considerable. ~~and water by requiring an Adaptive Management Plan for waterfowl management and multi-species mitigation at Struve Slough and Harkins Slough that includes developing multi-year baseline waterfowl data, and integrates hydrologic and fisheries data, for future project design, environmental permitting and CEQA impact analysis if project-level alternatives such that the Projects' contribution to the cumulative impacts would not be cumulatively considerable.~~

### Section 3.7, Hazards and Hazardous Materials

Staff-initiated changes were made to revise the text under Mitigation Measure HAZ-1a on page 3.7-10 as follows:

#### **Mitigation Measure HAZ-1a: Health and Safety Plan (HASP).**

Prior to demolition of any existing structures, PV Water shall require that structures to be demolished be surveyed to determine if hazardous materials are present. Using information from the survey and the soil testing performed as part of adopted Mitigation Measure HM-1, PV Water shall require the construction contractor(s) to prepare and implement a site-specific HASP in accordance with 29 Code of Federal Regulations 1910.12 0 to protect construction workers and the public during all excavation, grading, and demolition activities. The HASP shall include, but is not limited to, the following elements:

1. Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP;

2. A summary of all potential risks to construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals based on the most recent data collection and reporting;
3. Specified personal protective equipment and decontamination procedures, if needed;
4. Emergency procedures, including route to the nearest hospital; and
5. Procedures to be followed in the event that evidence of potential soil or groundwater contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered.

These procedures shall be in accordance with hazardous waste operations regulations and will specifically include, but are not limited to, the following: immediately stopping work in the vicinity of unknown discovered or suspected hazardous materials release and notifying the Santa Cruz County Environmental Health Services (831-454-2022). ~~CUPA (415-473-7085)~~

#### 4.2.5 Chapter 4, Other CEQA Issues

No revisions were made to this chapter.

#### 4.2.6 Chapter 5, Alternatives

No revisions were made to this chapter.

#### 4.2.7 Chapter 6, Report Preparers

No revisions were made to this chapter.

#### 4.2.8 Appendices

##### **Appendix PD-2. 2014 BMP Update PEIR Mitigation Measures**

Staff-initiated changes were made to revise the text under adopted Mitigation Measure BIO-2 on page PD 2-4 as follows:

**BIO-2:** During the development of BMP Update components, PVWMA will implement conservation measures during construction activities to avoid and minimize incidental take and significant impacts on individuals, populations, or habitat of special-status wildlife species to the maximum extent practicable. The following general measures will be incorporated into the planning and construction of BMP Update components, as appropriate, to ensure that the effects of the BMP Update are avoided, minimized, and mitigated.

Suggested species-specific measures for CA red-legged frog and, western pond turtle (WPT), ~~and steelhead~~ are included, as well, although BMP Update components that proposed to divert surface waters beyond existing entitlements would require future additional project-level CEQA analyses of specific diversion and operation plans to support water rights application and environmental permits. It is assumed that project-level biological studies and analysis for these BMP Update components will be required to support those future permits and biological opinions.

Staff-initiated changes were made to revise the text under adopted Mitigation Measure BIO-2h on page PD 2-5 as follows:

**BIO-2h:** Upon locating individuals of special-status species that are dead or injured as a direct result of activities conducted by PVWMA, initial notification will be made to the USFWS's Division of Law Enforcement at (916) 978-4861 (Sacramento) within three working days of its finding. The Ventura USFWS Field Office, North Coast Division (805-677-3330) ~~within whose area of responsibility the specimen is recovered~~ will also be notified. Written notification will be made within five calendar days and include the date, time, and location of the carcass, a photograph, cause of death, if known, and any other pertinent information.

Staff-initiated changes were made to revise the text under adopted Mitigation Measure BIO-2i on page PD 2-5 as follows:

**BIO-2i:** Nesting Bird Surveys. Prior to any project construction activities, the project proponent will take the following steps to avoid direct losses of nests, eggs, and nestlings and indirect impacts to avian breeding success:

- If construction activities occur only during the non- breeding season, between August 31 and February 1, no surveys will be required.

During the breeding bird season (February 1 through August 31), a qualified biologist with experience conducting nesting bird surveys will survey construction areas in the vicinity of the project site for nesting raptors and passerine birds not more than 14 days prior to any ground-disturbing activity or vegetation removal. Surveys will include all potential habitats within 500 feet (for raptors) of activities and all on-site vegetation including bare ground within 250 feet of activities (for all other species). If results are positive for nesting birds, avoidance procedures will be adopted, if necessary, on a case-by-case basis. These may include implementation of buffer areas (minimum 50-foot buffer for passerines and 250-foot minimum buffer for raptors) or seasonal avoidance.

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## **APPENDIX COM**

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### **Comments Received on the DEIR**

This appendix presents the comment letters received on the Watsonville Slough System Managed Aquifer Recharge and Recovery Projects Draft Environmental Impact Report.

October 2, 2020

Brian Lockwood  
Pajaro Valley Water Management Agency  
36 Brennan Street  
Watsonville, CA 95076

Re: Comments on the Watsonville Slough System Managed Aquifer Recharge  
and Recovery Projects Draft Environmental Impact Report, September 2020



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John Gilchrist  
Donna Murphy  
Kathleen Rose  
Marieke Rothschild  
Melody Sharp  
Joyce Shimizu  
Emily Thomas

**Executive Director**  
Stephen Slade

Dear Mr. Lockwood,

The Land Trust off Santa Cruz County has a mission to conserve and connect people with the places that make Santa Cruz County special. Our agricultural land is spectacularly productive and grows the healthiest food on earth in abundance.

This is an important project. Among the greatest threats to agricultural viability is sea water intrusion, and the proposed project is a cost effective approach to addressing that issue. We provide a couple comments below about agricultural land protection.

Our wetlands, riparian forests and coastal grasslands are also enormously productive from the perspective of biodiversity and ecosystem services such as improving water quality. The project as proposed does a good job of minimizing impacts to these ecosystems, although we also present a few comments below requesting consideration and clarification on this topic.

Overall we are comfortable with the potential for hosting the Struve Slough Pump Station on our ranch, as described in the Land Trust Property Alternative. That property is called Watsonville Slough Farm.

Overall we are comfortable with hosting the approximately one-half mile long segment of the Struve Slough to Filter Plant Pipeline that would cross the Bryant Habert portion of Watsonville Slough Farm. Those lands were sold to us at a discount by the Bryant and Habert families with the request that the lands be used to increase the viability of agriculture in the region, and for habitat enhancement. Hosting the pipeline will directly advance that goal.

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However, on both the intake and pipeline components of the project we have a few comments as presented below. 2  
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At the water intakes, solids from the slough water column will accumulate on the intake filter screen. At the intake pump station, solids that pass through the intake filter screen may accumulate if additional filtration is performed. Both of these filtration steps would generate a filter cake or collection of solids that will need to be addressed. In our reading of the document, we did not come to an understanding of the strategy for addressing these accumulated solids. The volume may be considerable, and it is important that they be addressed in a manner that minimizes environmental impacts. If the alternative intake site, located on Land Trust property, is selected, managing this material may have impacts to farming and other operations on Land Trust property. These should be characterized. 3

Nighttime security lighting is proposed for the intake site. Lighting will impact wildlife and the rural character of the site. Such lighting should be on motion sensors and timers to avoid illumination that is unnecessary for security, and thereby reducing environmental impacts. Cones and hoods should be included so as to not illuminate areas outside the facilities. 4

Segments of the proposed pipeline are proposed to cross Land Trust property for about a half mile in the area east of where it crosses the railroad tracks. Portions of this property have been restored for wetland restoration. Crossings of this restored habitat may necessitate trenchless construction. These wetlands typically dry completely each fall, but the water table is very shallow, potentially complicating construction. Wetland and grassland restoration areas may tolerate trenching and rehabilitation, but considerable care must be exercised. 5

The Watsonville Slough Conservation and Enhancement Plan (2003) envisions restoration of wetland habitat along the Watsonville Slough channel and construction of a separate agricultural drainage channel in proximity to where the Struve Slough to Filter Plant Pipeline crosses Watsonville Slough. In order to not preclude this future restoration and agricultural drainage water project, the pipeline in this area should be installed below the likely bed elevation of anticipated wetland restoration or agricultural drainage channel project, with sufficient cover to minimize conflict between the two projects. From our experience with wetland restoration and agricultural drainage management in the area, we expect that the bed of such features would be no lower than an elevation of 5.0 feet NGVD. 6

The Watsonville Slough Farm Management Plan (2012) includes an array of habitat restoration projects. Many of these have been implemented, but a number remain outstanding, and could serve as mitigation project sites for the proposed project. We are willing to engage with PV Water about this potential. Our property was acquired with grant funds from the California State Coastal Conservancy and Wildlife Conservation Board. Approval from those entities will be required as a precondition of any mitigation projects. 7

The proposed project includes impacts to agriculture. The 240 acres of farmland on Watsonville Slough Farm is at risk from seawater intrusion and other impacts to its water supply. Connecting this property to the Coastal Distribution System would be a significant boost to the viability of this farmland. That connection has been conceptually designed by PV Water but has not been implemented. As part of the proposed project, connecting this farmland to the Coastal Distribution System would be cost effective, using the same trenches and equipment mobilization as for the proposed project. Perhaps that connection, which would be a substantial 8

benefit to agricultural viability, could serve in part as mitigation for impacts to agricultural land by the proposed project.

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cont.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in blue ink, reading "Bryan Largay". The signature is fluid and cursive, with the first name "Bryan" and last name "Largay" clearly distinguishable.

Bryan Largay

Conservation Director

October 19, 2020

Pajaro Valley Water Management Agency  
ATTN: Brian Lockwood  
36 Brennan Street  
Watsonville, CA 95076

Email: [eir@pvwater.org](mailto:eir@pvwater.org)

Re: Draft EIR for the Watsonville Slough System Managed Aquifer Recharge and Recovery Projects

Dear Mr. Lockwood:

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments:

***AIR-1 Air Quality Impacts and Mitigation Measures***

To further reduce construction-related emissions including odors and short-term diesel particulate matter, the Air District recommends using construction equipment which conforms to the Air Resources Board's Tier 3 or Tier 4 emission standards. Where feasible, construction equipment should use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

For architectural coatings used in the project, Air District Rule 426 may apply. Please contact the Air District's Engineering Division for more information at (831) 647-9411.

Please let me know if you have any questions. I can be reached at (831) 718-8021 or [hmuegge@mbard.org](mailto:hmuegge@mbard.org).

Best Regards,



Hanna Muegge  
Air Quality Planner

cc: Richard A. Stedman  
David Frisbey



# Watsonville Wetlands Watch

P.O. Box 1239 • Freedom, CA 95019

[www.watsonvillewetlandswatch.org](http://www.watsonvillewetlandswatch.org)

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

October 19, 2020

Brian Lockwood  
General Manager  
Pajaro Valley Water Management Agency  
36 Brennen Street  
Watsonville, CA 95076

Dear Brian,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Watsonville Slough System Managed Aquifer Recharge and Recovery Project. We greatly appreciate the Agency’s work to support groundwater sustainability within the Pajaro Valley, and recognize the importance of this project within the overall approach to meeting groundwater sustainability goals as developed by the Agency and community within the basin management Planning efforts.

We have developed the following questions and comments related to the Draft EIR:

1. Mitigation Measure BIO-1d and other mitigation measures discuss the proposed measures to mitigate for both temporary and permanent loss of wetlands. We greatly value the work of the NRCS and the Santa Cruz RCD in advancing critical wetland preservation and restoration efforts in the Watsonville Slough System. If the documents is to list partners for mitigation work, we request that you also list Watsonville Wetlands Watch, as our organization has been actively working on environmental restoration work within the slough system for over 20 years and is interested to explore ways to advance and implement mitigation measures should they be determined to be required by the project permitting agencies.

We feel however, more important than listing local partners is to clearly articulate that all mitigation work, such as replacement of riparian or wetland habitat, will be performed *within the Watsonville Slough System*. While we have a preference for onsite mitigation, we would request that all off-site mitigation be conducted *within the Watsonville Slough System*. Given the potentially significant impacts that this project will have on the slough system, we feel that this is an important measure. We would also request that a Habitat Mitigation and Management Plan be developed to support implementation of this measure and that the development of this plan be listed as a mitigation measure. We would request the opportunity for our organization to support the development of this plan in conjunction with other local, State, or federal agencies and we would look forward to

partnering with the agency to determine an achievable path forward to implement the work the Habitat Mitigation and Management Plan.

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2. The project identifies a potential loss of 11.9 acres of wetland habitat within Harkins Slough and 3.6 acres within Struve Slough. Please clarify that mitigation for resulting loss of wetlands will be included within mitigation measures to be mitigated at a 3:1 ratio. The current mitigation measures appear to not clearly state to us how these impacts will be mitigated, such as in Bio-1d and BR-1c. As in our comment above, we request that this work be done either on site or as off-site compensatory mitigation *within the Watsonville Slough System*. As per our comment above, we request that this work be implemented in accordance with the Habitat Restoration and Management Plan.

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3. The DEIR discusses the plan and need for an Adaptive Management Plan. The DEIR makes many assumptions about the potential impacts of the project on wetlands and wildlife and while we assume that these represent the best available science, we also recognize that environmental conditions and other land use changes will change over time. An Adaptive Management Plan is important to ensuring that the use of water in the slough system is guided by a plan which can guide management of infrastructure associated with this project in a way that minimizes impacts to wildlife and wetland resources over time and supports best management of the slough system overall for the many important uses including this project. We feel that given the potential impacts it would be appropriate to specify that the Adaptive Management Plan would be implemented as a part of a mitigation measure for the project, such as BIO-1d, or otherwise stated in such a way as to represent a commitment to complete this important document. Please also clarify the timeline for completion of such a plan. We would request to serve as a technical advisor for this plan.

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We want to once again thank the Pajaro Valley Water Management Agency for your stewardship of groundwater and water resources in the Pajaro Valley and your careful operations of current infrastructure within the slough system. We are interested to support outcomes related to best management of wildlife and wetland habitat and natural resources and the planning for these efforts. Please don't hesitate to reach out to our Executive Director, Jonathan Pilch, for support and consultation during this process.

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Sincerely,



Donna Bradford  
President of the Board of Directors  
Watsonville Wetlands Watch