Initial Study/Mitigated Negative Declaration (Draft) for the

Miles Lane Project

New Affordable Housing and Continued Drug Treatment and Rehabilitation Services

139-161 Miles Lane and 201 Kimberly Lane
City of Watsonville
December 2, 2019

Prepared by:

MIG

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1. Project Information

1.1 Project Title
Initial Study/Mitigated Negative Declaration for the Miles Lane Project

1.2 Lead Agency Name and Address
City of Watsonville
Community Development Department
Planning Division
250 Main Street
Watsonville, California 95076

1.3 Contact Person and Phone Number
Justin Meek, AICP
Principal Planner
(831)768-3050
justin.meek@cityofwatsonville.org

1.4 Project Sponsors Names and Addresses
MidPen Housing
275 Main Street, Suite 204
Watsonville, CA 95076
and
Encompass Community Services
380 Encinal Street
Santa Cruz, CA 95060

1.5 General Plan Designation
1) Residential Medium Density
2) Environmental Management

1.6 Zoning
1) RM-2: Multiple Residential-Medium Density
2) EM-OS: Environmental Management Open Space

1.7 Introduction
This Initial Study of environmental impacts has been prepared to conform to the requirements of the Public Resources Code California Environmental Quality Act (CEQA Statutes), the California Code of Regulations section 15000 et. Seq. (CEQA Guidelines), and the regulations and policies of the City of Watsonville. The report is intended to inform City of Watsonville (City) decision-makers, responsible agencies, and the general public of the Miles Lane Project (project) and its environmental consequences. The City of Watsonville is the Lead Agency under CEQA and has prepared this Initial Study to address the impacts of implementing the proposed project. The primary objectives of the project are for MidPen Housing to provide affordable housing in the community and for Encompass Community Services to continue to provide drug treatment and rehabilitation services.

1.8 Project Location and Context
The following section describes the project site's location, surrounding land uses, site characteristics, and land use designations.

Location. The project site (139-161 Miles Lane and 201 Kimberly Lane) is on the south side of Miles Lane and northeast of Santa Clara Street. The project is located west of Freedom Blvd and north of Crespi Way in the Portola Heights Mobile Home Park (Figures 1 and 2). The parcels are associated with their respective addresses as follows:

- 139 Miles Lane (APN 016-491-03)
- 161 Miles Lane (APN 016-491-01 141)
- 141- 155 Miles Lane (APN 016-491-02 201)
- 201 Kimberly Lane (APN 016-111-44)

Surrounding Land Uses. The site is located within a residential area but also within 200 feet of commercial services along Freedom Blvd. Single- and multi-family homes, along with an open space area adjacent to the perennial stream (streams that have running water year-round), lie across Miles Lane to the northwest of the project. Single family homes, across Santa Clara Street and on Kimberly Lane, lie to the southwest. The Portola Heights Mobile Home Park lies to the south and southeast of the project while commercial services, along with a multi-family residence, located along Freedom Blvd. bound the project to the northeast.

Site Characteristics. The proposed project will occur on an approximately 4.7-acre site. The Property is set in a primarily residential neighborhood. The western section of the site is developed with several houses and cottages, along with a separate workshop. The northwest corner of the Property is occupied by two adjoining parking lots while one is paved. Much of the property remains undeveloped especially in the east portions of the Miles Lane parcels. The Kimberly Lane parcel is an approximately rectangular subdivision parcel of just over 5,000 square feet, that has not been developed.

The 161 Miles Lane parcel (a portion of which serves as a licensed residential substance use disorder treatment program) is improved with two houses of approximately 3,500 square feet, total, with concrete walkways and patios and a separate workshop of about 2,100 square feet. All buildings are constructed of wood frame, with stucco siding, and composite shingle roofing. There is a 12 ft. by 25 ft. car garage with dirt floor adjoining the shop building. There are three small houses (141, 149, and 153 Miles Lane), and two smaller cottages (145 and 155 Miles Lane) on parcel 016-491-02 (141 Miles Ln.) These appear to be and are reportedly constructed similarly to the houses at 161 Miles Lane, and range in size from just over 500 square feet to just over 1,000 square feet. The house at 149 Miles Lane has a membrane roofing system installed; and the house at 153 Miles Lane needs structural repairs and is currently vacant. There is a separate detached 12 ft by 20 ft car garage associated with 155 Miles Lane.

The site has a challenging topography, sloping steeply downward from the intersection of Miles Lane and Santa Clara Street eastward to roughly mid-block and then steeply upward again to reach the intersection of Miles Lane with Freedom Blvd. There an approximately 62-foot decline from the west corner of the site to the low point and then a 42-foot incline from the low point back up to the east corner of the site. At the lowest elevation of the site are sensitive natural features including a perennial stream running north to south across the property and a seep wetland (approximately 2,200 square feet) to the east of the stream. The stream is located within the City's EM-OS Zoning District which protects it

from development. Additionally, the 139 Miles Lane parcel is atypically shaped and such that a long and narrow piece of the parcel wraps behind 135 Miles Lane.

1.9 Project Description

MidPen Housing Corporation (MidPen) and Encompass Community Services (Encompass) are jointly submitting an application to develop four parcels located on 139-161 Miles Lane (APNs: 016-491-01, 016-491-02, 016-491-03) and 201 Kimberly Lane (APN: 016-111-44) totaling approximately 4.7 acres, collectively called the Miles Lane Project (project). Encompass currently leases the property at 161 Miles Lane to operate a residential substance abuse treatment facility known as *Si Se Puede*. The facility has 23 beds and totals 3,425 square feet. The 141 Miles Lane property contains three rental homes, one transitional rental home and one that is uninhabitable (totaling 3,044 square feet). As part of this project, the existing buildings would be demolished creating an estimated 1,300 cubic yards of solid waste. The demolition site plan is included as Figure 3.

Construction is anticipated to last about 16 months and start with two weeks of abatement followed by one week of demolition. Site preparation and grading are anticipated to last four months (the grading would be balanced on-site with no import or export of material); the building construction period is anticipated to last 11 months. Figure 4 (Earthworks) shows the cut and fill plan for the project.

In total, the project will include a residential substance use disorder treatment facility and an outpatient rehabilitation facility owned by Encompass, and a 61-unit affordable housing development owned by MidPen. The affordable housing development would provide housing for low, very low, and extremely low-income households. The project facilities include 10 buildings that would total approximately 106,400 square feet. Eight of the buildings would be used for providing affordable housing (operated by MidPen) and two of the buildings would be used as an inpatient (residential) and outpatient facilities, respectively (operated by Encompass). The overall site plan is shown as Figure 5.

To serve the housing, the project includes a centrally located community building that will include the following amenities: a community room and kitchen, a computer lab, a Learning Center for afterschool programming, a laundry room, and property manager and service manager offices. The Encompass' residential facility will average 28 program participants, with a maximum capacity of 30 residents, and is staffed 24/7. The inpatient facility will provide housing for 17 residents per night. The number of FTE staff will increase from 14 to 15 with a maximum of nine staff onsite at one time. The outpatient facility will serve 40 to 85 total clients per day and operate 9 AM to 5 PM on weekdays, with weekday evening hours of 5-9 PM, three to four days per week. The current outpatient program is on Auto Center Drive; the eight employees at this location will be transferred to the new facility after construction is completed.

A perennial stream runs through the western section of APN 016-491-03. The channel itself is deeply incised with little bank formation, and is unusually straight, indicating that it was likely dug through the property at some point in the past. The channel ends in a stormwater structure that causes water to backup into the channel and pool during the summer months. This structure also acts as a barrier to animals such as frogs and fish. Additionally, a hillside seep feeds a 0.05 acre wet meadow. The seep begins on the hillside on the eastern portion of the study area and spreads out into the flatter section of the property.

Circulation and Parking. The parking lot for the inpatient and outpatient facilities would be accessed from Miles Lane (Driveway 1) near the corner of Santa Clara Street and Kimberley Lane. There will be three vehicular entrances to the affordable housing facility, all along Miles Lane (Driveways 2, 3, and 4). Volumes to the project site are expected to be distributed among each of the project driveways. A

total of 143 residential parking spaces and 27 spaces for the inpatient and outpatient facilities are proposed.

Landscape and Open Space. The project includes both landscaping features as well as open space / recreational facilities. The project will include the planting of 109 trees and low water use ornamental plantings. Additionally, the project includes a trail easement in proximity to the wetland area. The following recreational facilities are included with the project: (1) 1,075 square-foot play space with climbing structure; (2) 8,430 square feet of artificial turf for recreational activities; (3) 930 square-foot courtyard with tables and BBQ; (4) a 2,670 square-foot community garden with raised beds; and a 380 square-foot observation patio. The conceptual landscape plan is shown in Figures 6 and 7.

Grading. The project would create approximately 81,000 square feet of impervious surfaces (Figures 8 and 9). The project would comply with stormwater treatment requirements and includes bio-retention areas in excess of what is required by regulations. The project site would be graded, and stormwater retention would be accomplished by a combination of underground infiltration and above ground retention.

Utilities and Infrastructure. The proposed project would connect to existing water, wastewater, storm drainage, electricity, and telecommunication infrastructure. Water service, wastewater treatment, stormwater management, and solid waste collection are provided by the City. Electricity and natural gas are provided by PG&E. The on-site utilities plan is shown on Figure 10 and the Photometric Plan is included as Figure 11.

Project Construction and Excavation. Construction is anticipated to begin in May 2020 and be completed in October 2021.

City Actions/Approvals. The proposed project would require the following City approvals:

- Adoption of the Mitigated Negative Declaration – City Planning Commission and City Council
- Zoning Change to Planned Development – City Planning Commission and City Council
- Special Use Permit (New Construction) – City Planning Commission and City Council
- Design Review – City Planning Commission and City Council
- Preliminary Map Approval (Lot Line Adjustment) – City Planning Commission and City Council
- Building/Fire Permit and Plan Check – City of Watsonville, Building Department

Other Public Agencies Whose Notification and/or Approval is Required. The proposed project would require the following public agencies to be notified and/or approvals:

- Army Corp of Engineers, Section 404 Permit

Figure 1 Regional Location

Miles Lane Project, Watsonville

Figure 2 Project Vicinity

Miles Lane Project, Watsonville

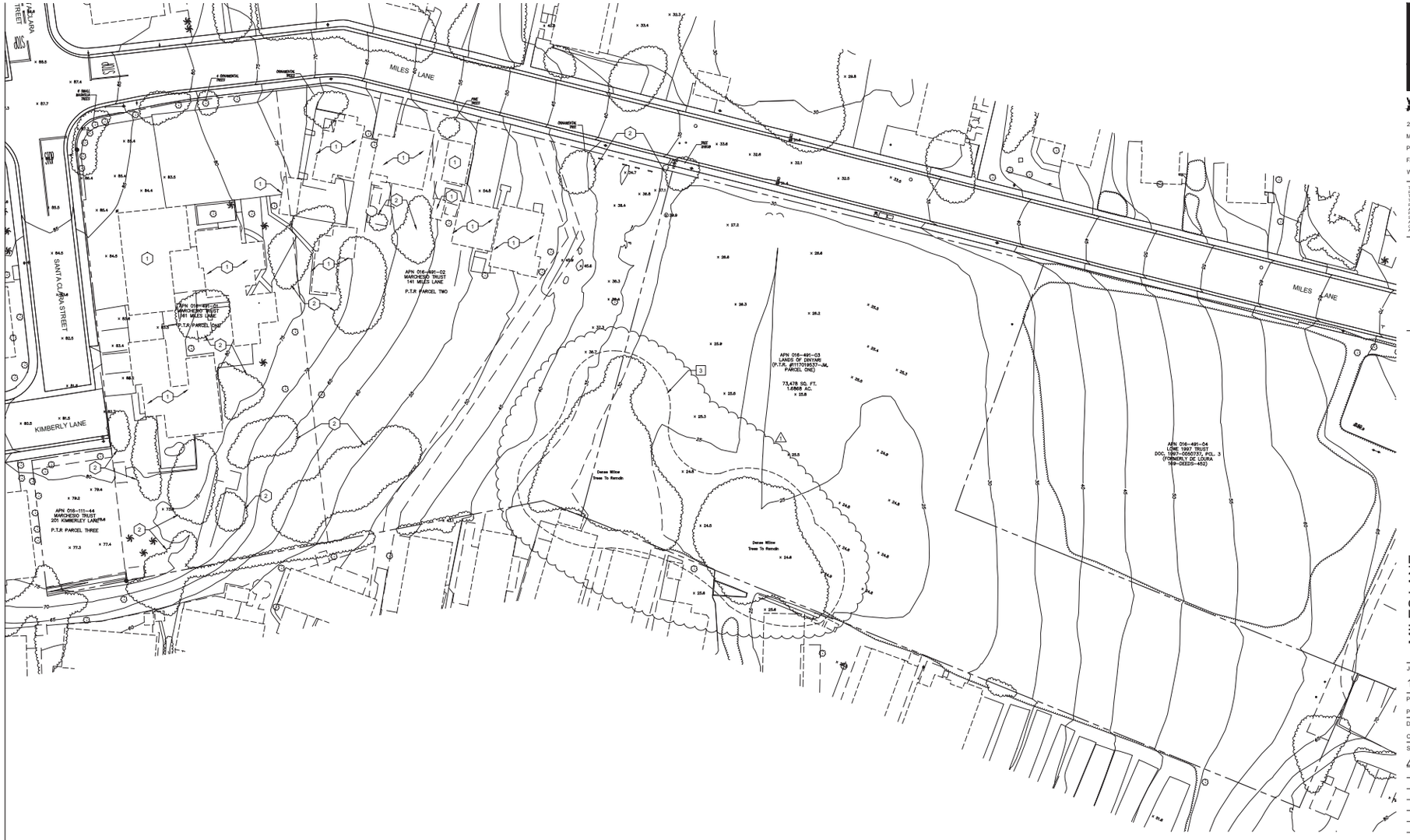

Figure 3 Demolition Plan

1 DEMOLITION SITE PLAN
SCALE: 1"=30'-0"

PLAN NORTH

DEMOLITION KEY NOTES

THE KEY NOTES THAT FOLLOW APPLY TO THE DRAWING(S) ON THIS SHEET ONLY. REFER TO FOLLOWING SHEETS FOR NOTES THAT ARE APPLICABLE TO THOSE DRAWINGS.

1. REMOVE EXISTING SINGLE STORY WOOD FRAME STRUCTURE.
2. REMOVE EXISTING TREE - TYPICAL
3. EXISTING TREE GROVE - SEE SEPARATE BIOLOGICAL REPORT FOR PROTECTIONS, ALLOWABLE REMOVAL, ETC.

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MILES LANE HOUSING

MidPen Housing Corp.
139/141 Miles Lane & 201 Kimberly Lane
Watsonville, California 95076

APNs: 016-491-01, 02 & 03, 016-111-44

JOB NO. 17148.1

PRINT DATE:	
PLOT DATE:	06.12.2019
DRAWN BY:	MG
CHECKED BY:	ATH

SET ISSUED:
⚠ PLANNING COMMENTS 06.10.2019

SHEET NAME
DEMOLITION SITE PLAN

SHEET NO.
D100

FILE NAME: 17148 - D100

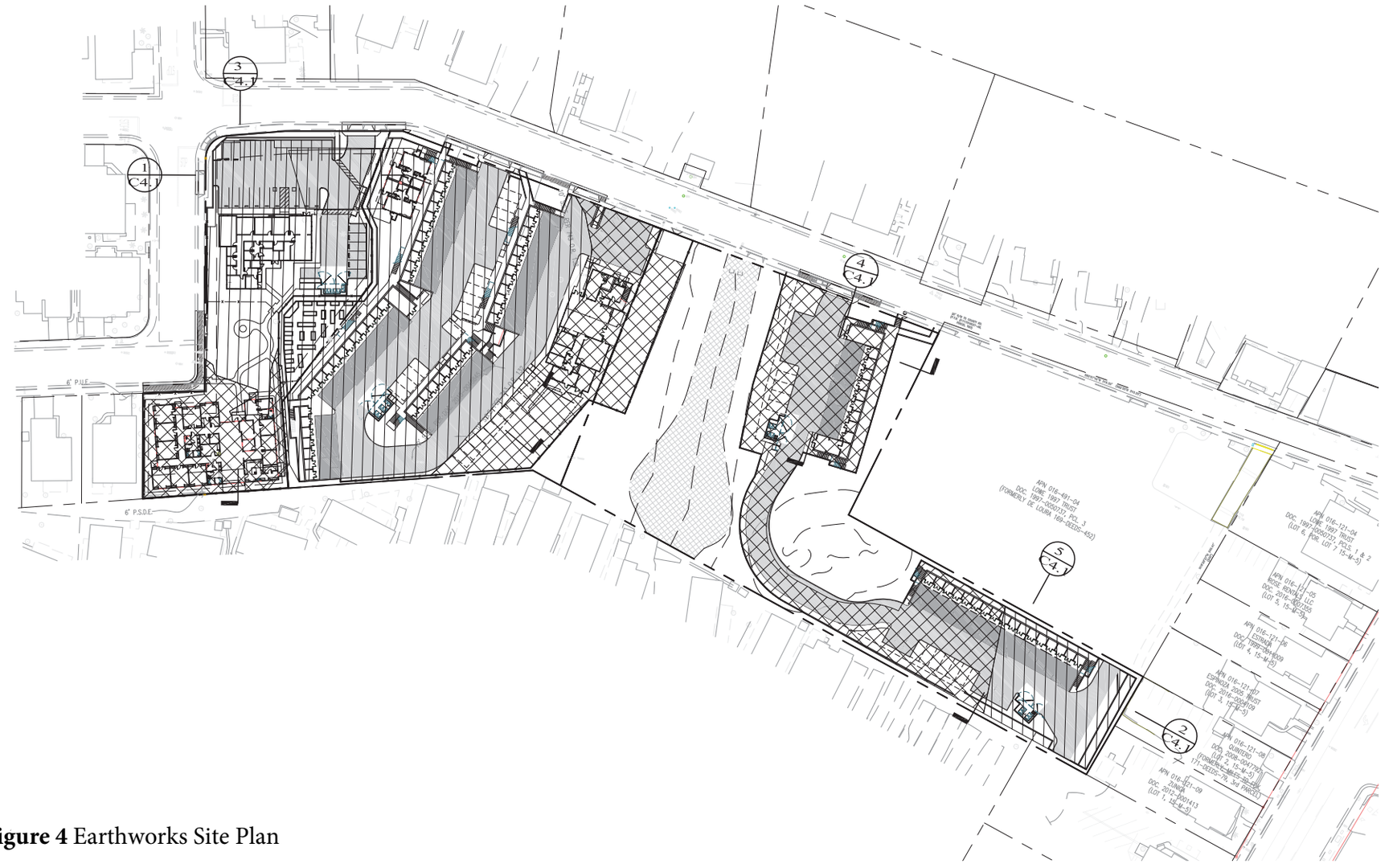

Figure 4 Earthworks Site Plan

HATCH LEGEND

CUT

FILL

EARTHWORK QUANTITIES:
CUT = 8900 CY
FILL = 8900 CY
NET = 0 CY FILL

SITE PLAN
1" = 40'

40 0 40 80 120
Scale 1" = 40'

Drawing file: Z:\Projects\118186 MND - Miles Lane\Dwg\118186 XSbase.dwg
Plotted: Jun 12, 2019 - 9:12am

C3 ENGINEERING
INNOVATE. FABRICATE.
Civil Engineering Land Development
Stormwater Management
126 Bonifacio Place, Suite C, Monterey, CA 93940
Phone:(831)647-1192 Fax:(831)647-1194
mail@C3Engineering.net

REV.	DATE	DESCRIPTION	BY
1			
2			
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MADE IN THE USA

REGISTERED PROFESSIONAL ENGINEER
FRANK J. CAMPO
No. 61390
EXP. 06/30/19
CIVIL
STATE OF CALIFORNIA

EARTHWORK SITE PLAN

MIXED-USE DEVELOPMENT
APN# 016-491-03

Project Location: 139 MILES LANE, WATSONVILLE, CA 95076
PREPARED FOR: MIDPEN HOUSING CORPORATION

SCALE:	AS NOTED
DATE:	06-10-2019
DESIGN BY:	FJC
DRAWN BY:	ECH
CHECKED BY:	FJC
SHEET NUMBER:	C4.0
OF — SHEETS	
PROJECT#	118-186

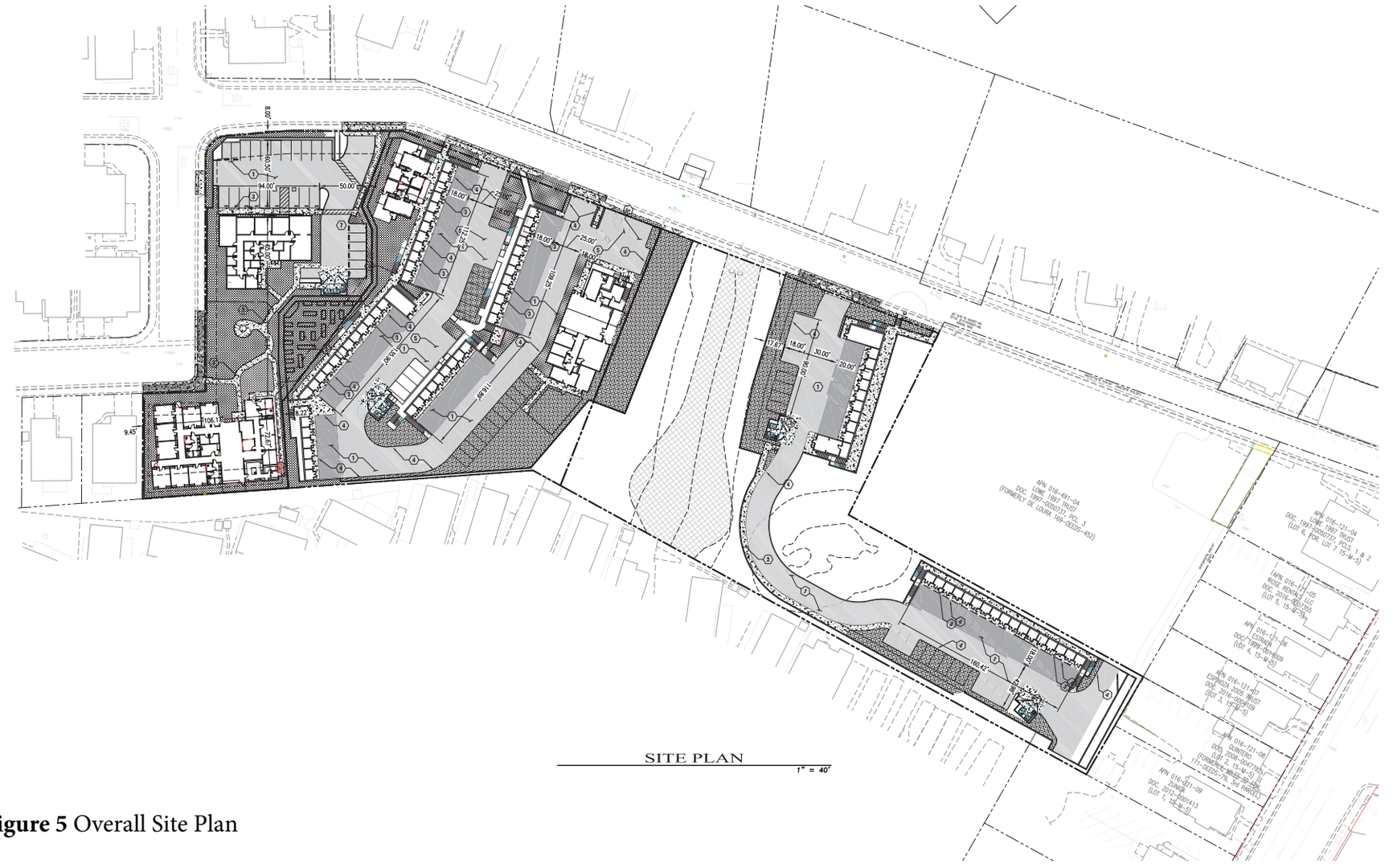

Figure 5 Overall Site Plan

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EXP. 06/30/19

REV.	DATE	DESCRIPTION	BY
		MADE IN THE USA	

OVERALL SITE PLAN

MIXED-USE DEVELOPMENT
APN# 016-491-03

Project Location: 139 MILES LANE, WATSONVILLE, CA 95076
PREPARED FOR: MIDPEN HOUSING CORPORATION

SCALE:	AS NOTED
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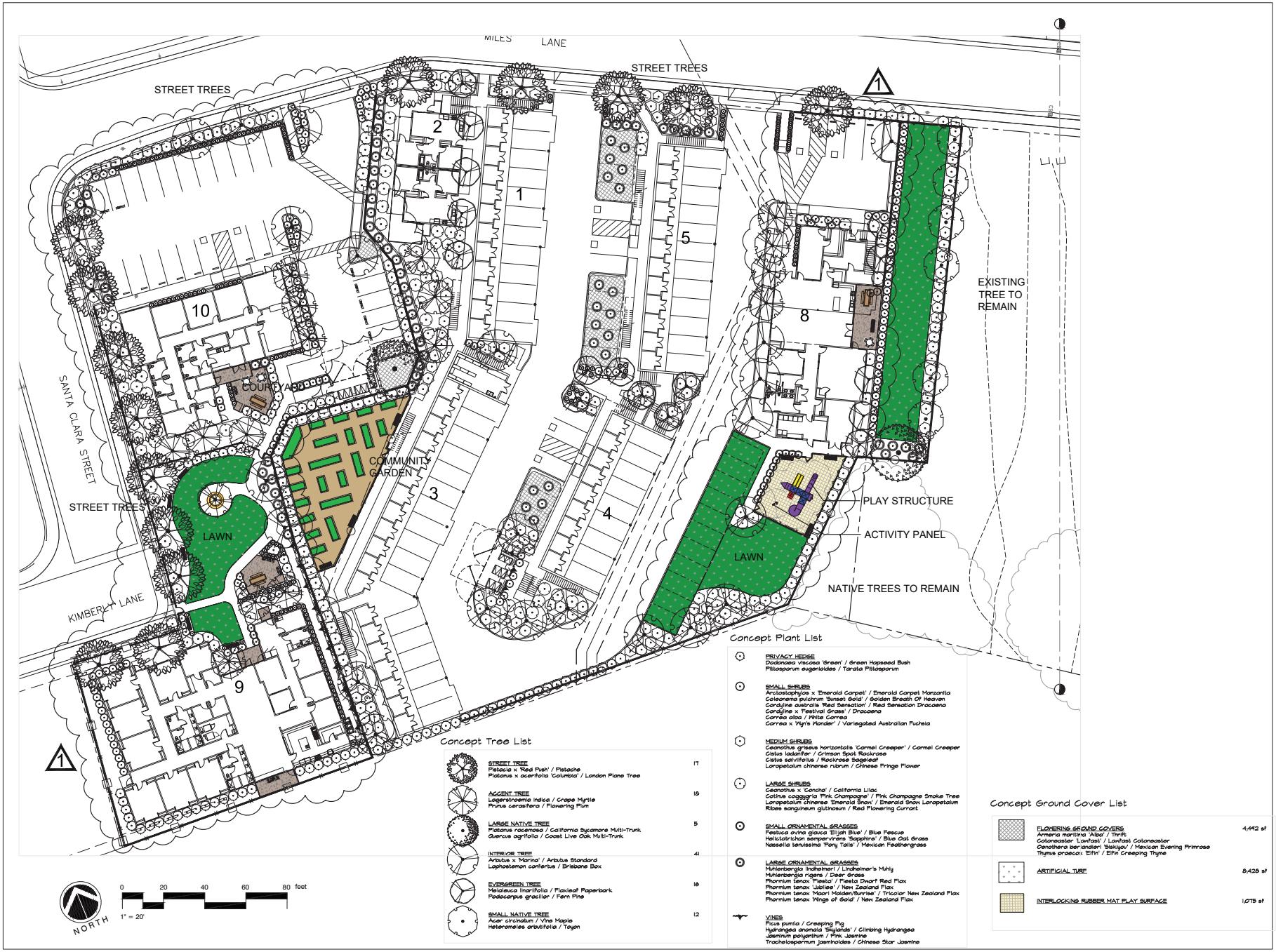
DESIGN BY:	FJC
DRAWN BY:	ECH
CHECKED BY:	FJC
SHEET NUMBER:	C2.1
OF — SHEETS	
PROJECT#	118-186



Michael Arnone + Associates
LANDSCAPE ARCHITECTURE
3370 Samuel Pl. Santa Cruz, CA 95062
831.462.688 mike@arnonelandscape.com www.arnonelandscape.com

MIDPEN HOUSING
MILES LANE
WATSONVILLE, CALIFORNIA

REVISIONS
1 6.10.19

LICENSED LANDSCAPE ARCHITECT
MICHAEL A. ARNONE
No. 3347
(Exp 7/31/20)
STATE OF CALIFORNIA

CONCEPTUAL LANDSCAPE PLAN

JOB NO.	201840
SCALE	1" = 20' - 0"
DRAWN	MA
CHECK	JC/MA
DATE	6.10.19

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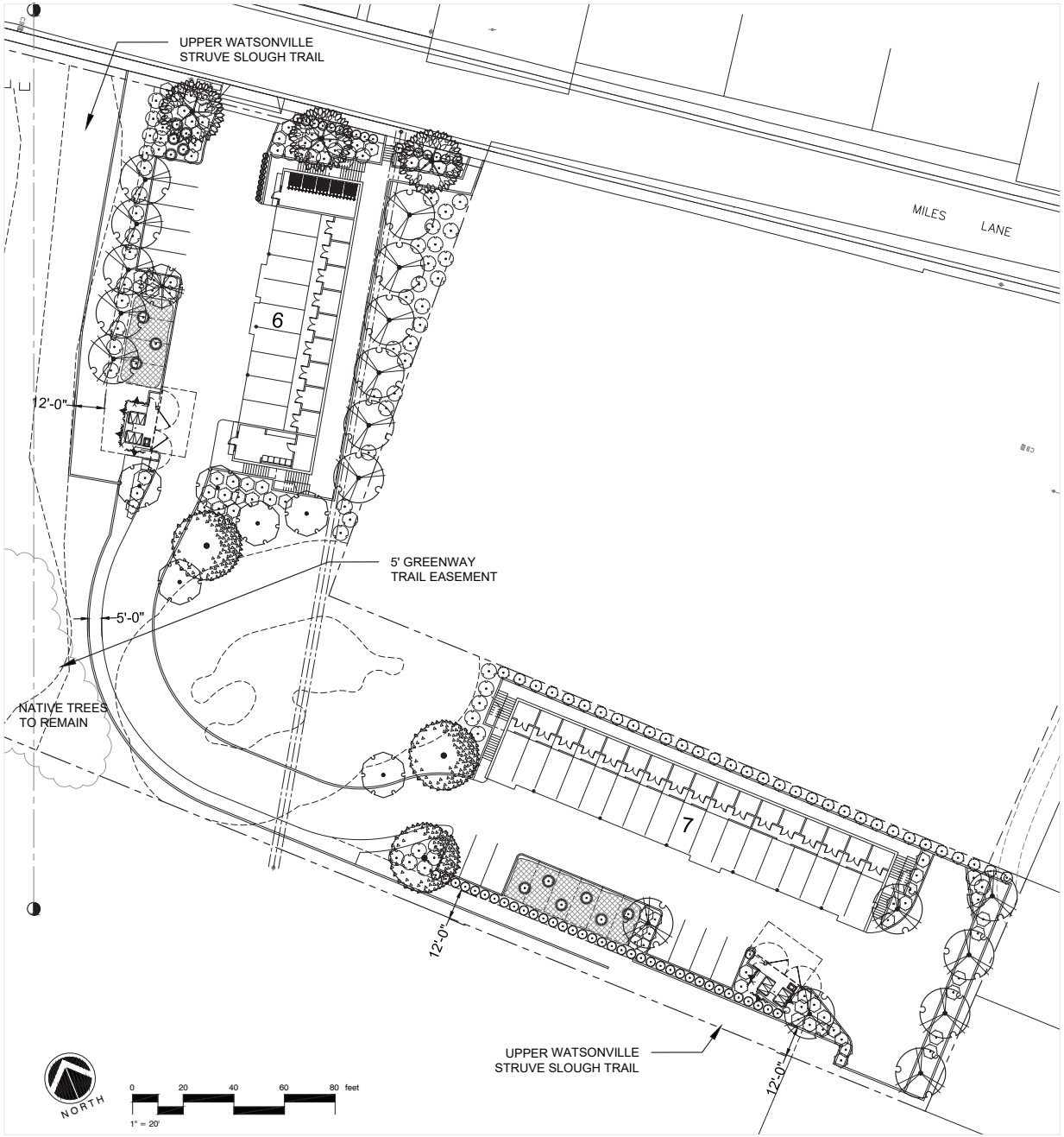
SHEET 1 OF 6

Figure 6 Conceptual Landscape Plan



Concept Plant List

STREET TREE — 17
Pistacia x 'Red Push' / Pistache
Platanus x acerifolia 'Columbia' / London Plane Tree

ACCENT TREE — 18
Lagerstroemia indica / Crape Myrtle
Prunus cerasifera / Flowering Plum

LARGE NATIVE TREE — 5
Platanus racemosa / California Sycamore Multi-Trunk
Quercus agrifolia / Coast Live Oak Multi-Trunk

INTERIOR TREE — 41
Arbutus x 'Marina' / Arbutus Standard
Lophostemon confertus / Brisbane Box

EVERGREEN TREE — 16
Melaleuca linariifolia / Flaxleaf Paperbark
Podocarpus gracilior / Fern Pine

SMALL NATIVE TREE — 12
Acer circinatum / Vine Maple
Heteromeles arbutifolia / Toyon

PRIVACY HEDGE
Dodonaea viscosa 'Green' / Green Hopseed Bush
Pittosporum eugenioides / Tarata Pittosporum

SMALL SHRUBS
Arctostaphylos x 'Emerald Carpet' / Emerald Carpet Manzanita
Coleonema pulchrum 'Sunset Gold' / Golden Breath Of Heaven
Cordyline australis 'Red Sensation' / Red Sensation Dracaena
Cordyline x 'Festival Grass' / Dracaena
Correa alba / White Correa
Correa x 'Wyn's Wonder' / Variegated Australian Fuchsia

MEDIUM SHRUBS
Ceanothus griseus horizontalis 'Carmel Creeper' / Carmel Creeper
Cistus 'Ladanifer' / Crimson Spot Rockrose
Cistus salvifolius / Rockrose Sageleaf
Loropetalum chinense rubrum / Chinese Fringe Flower

LARGE SHRUBS
Ceanothus x 'Concha' / California Lilac
Cotinus coggygria 'Pink Champagne' / Pink Champagne Smoke Tree
Loropetalum chinense 'Emerald Snow' / Emerald Snow Loropetalum
Ribes sanguineum glutinosum / Red Flowering Currant

SMALL ORNAMENTAL GRASSES
Festuca ovina glauca 'Elijah Blue' / Blue Fescue
Helictotrichon sempervirens 'Sapphire' / Blue Oat Grass
Nassella tenuissima 'Pony Tails' / Mexican Feathergrass

LARGE ORNAMENTAL GRASSES
Muhlenbergia lindheimeri / Lindheimer's Muhly
Muhlenbergia rigens / Deer Grass
Phormium tenax 'Fiesta' / Fiesta Dwarf Red Flax
Phormium tenax 'Jubilee' / New Zealand Flax
Phormium tenax 'Maori Maiden/Sunrise' / Tricolor New Zealand Flax
Phormium tenax 'Wings of Gold' / New Zealand Flax

VINES
Ficus pumila / Creeping Fig
Hydrangea anomala 'Skylands' / Climbing Hydrangea
Jasminum polyanthum / Pink Jasmine
Trachelospermum jasminoides / Chinese Star Jasmine

FLOWERING GROUND COVERS — 4,442 sf
Armeria maritima 'Alba' / Thrift
Cotoneaster 'Lowfast' / Lowfast Cotoneaster
Oenothera berlandieri 'Siskiyou' / Mexican Evening Primrose
Thymus praecox 'Elfin' / Elfin Creeping Thyme

ARTIFICIAL TURF — 8,428 sf

INTERLOCKING RUBBER MAT PLAY SURFACE — 1,075 sf

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LANDSCAPE ARCHITECTURE
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831.462.688 mike@arnonelandscape.com www.arnonelandscape.com

MIDPEN HOUSING
MILES LANE
WATSONVILLE, CALIFORNIA

REVISIONS

LICENSED LANDSCAPE ARCHITECT
MICHAEL A. ARNONE
No. 3347
(Exp 7/31/20)
STATE OF CALIFORNIA

CONCEPTUAL
LANDSCAPE PLAN

JOB NO.	201840
SCALE	1" = 20' - 0"
DRAWN	MA
CHECK	JC/MA
DATE	6.10.19

SHEET
L-1.1

SHEET 2 OF 6

Figure 7 Conceptual Landscape Plan

Figure 8 Grading and Drainage Plan

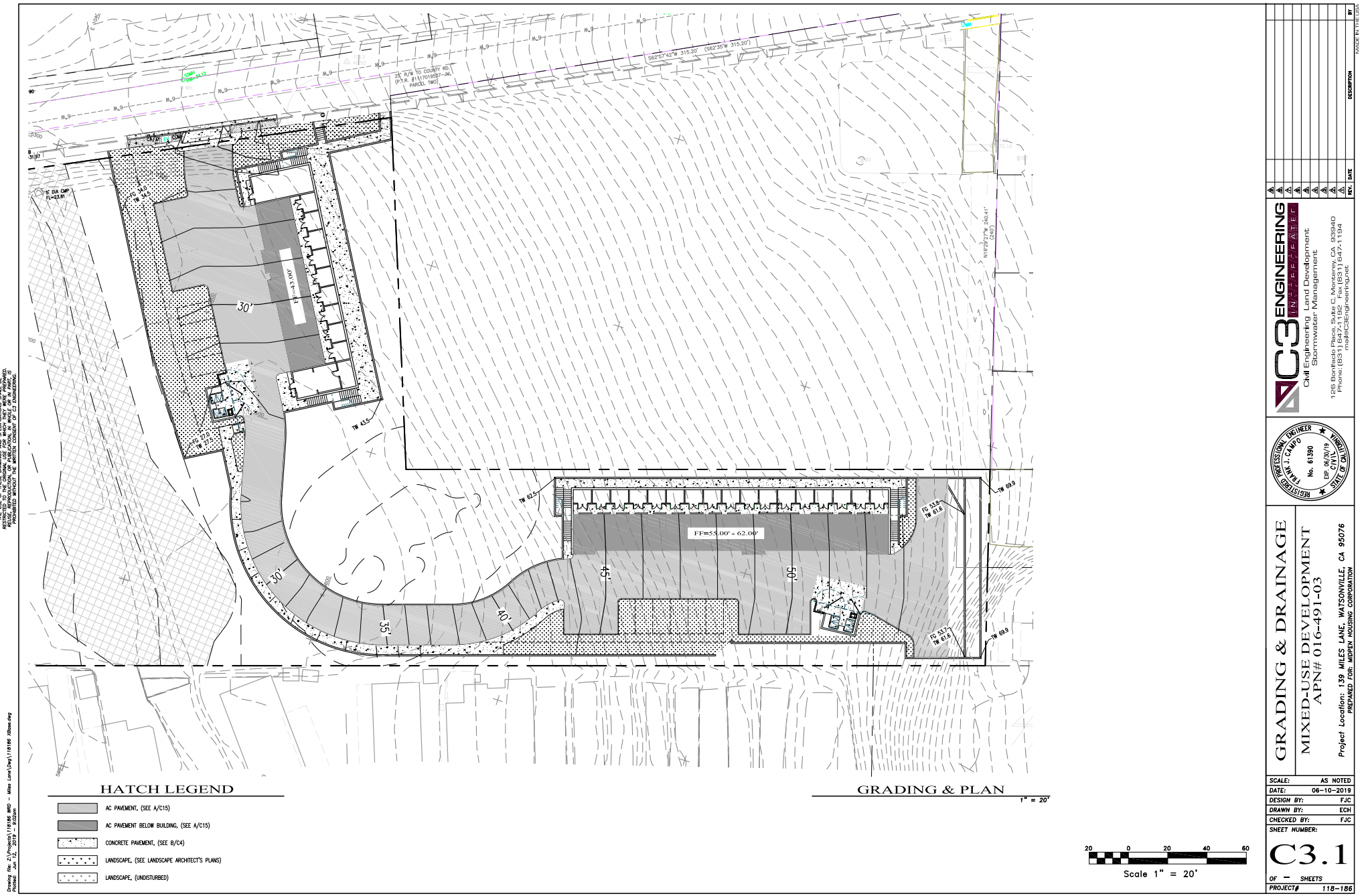
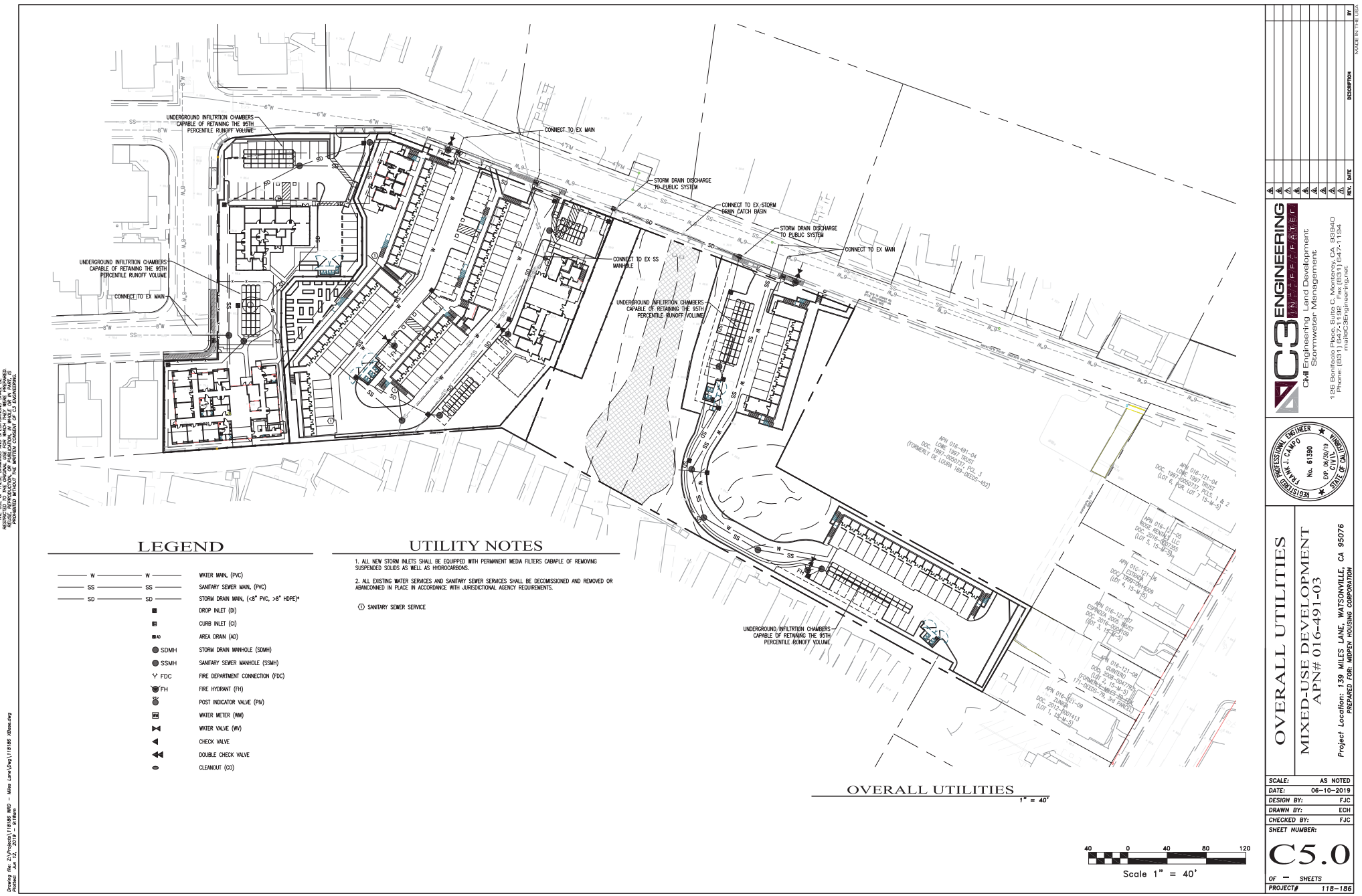


Figure 9 Grading and Drainage Plan



LEGEND

W W	WATER MAIN, (PVC)
SS SS	SANITARY SEWER MAIN, (PVC)
SD SD	STORM DRAIN MAIN, (<8" PVC, >8" HDPE)*
	DROP INLET (DI)
	CURB INLET (CI)
AD	AREA DRAIN (AD)
SDMH	STORM DRAIN MANHOLE (SDMH)
SSMH	SANITARY SEWER MANHOLE (SSMH)
FDC	FIRE DEPARTMENT CONNECTION (FDC)
FH	FIRE HYDRANT (FH)
PIV	POST INDICATOR VALVE (PIV)
WM	WATER METER (WM)
	WATER VALVE (WV)
	CHECK VALVE
	DOUBLE CHECK VALVE
	CLEANOUT (CO)

UTILITY NOTES

1. ALL NEW STORM INLETS SHALL BE EQUIPPED WITH PERMANENT MEDIA FILTERS CABAPLE OF REMOVING SUSPENDED SOLIDS AS WELL AS HYDROCARBONS.

2. ALL EXISTING WATER SERVICES AND SANITARY SEWER SERVICES SHALL BE DECOMISSIONED AND REMOVED OR ABANCONNED IN PLACE IN ACCORDANCE WITH JURISDICTIONAL AGENCY REQUIREMENTS.

① SANITARY SEWER SERVICE

OVERALL UTILITIES
1" = 40'

Scale 1" = 40'

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Civil Engineering, Land Development
Stormwater Management
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mail@C3Engineering.net

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OVERALL UTILITIES

MIXED-USE DEVELOPMENT
APN# 016-491-03

Project Location: 139 MILES LANE, WATSONVILLE, CA 95076
PREPARED FOR: MIDPEN HOUSING CORPORATION

SCALE:	AS NOTED
DATE:	06-10-2019
DESIGN BY:	FJC
DRAWN BY:	ECH
CHECKED BY:	FJC
SHEET NUMBER:	C5.0
OF — SHEETS	
PROJECT#	118-186

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Figure 10 Utilities Plan

PHOTOMETRIC SITE PLAN
SCALE: 1"=30'-0"

LUMINAIRE SCHEDULE

CALLOUT	SYMBOL	LAMP	DESCRIPTION	BALLAST	MOUNTING	MODEL	VOLTS	NOTE 3	QUANTITY
1P	○–□	(1) LED, LED	DSX0 LED Visual Comfort, P3 symmetric Type V distribution 30K	ELECTRONIC	POLE	Lithonia Lighting, DSX0 LED P3 VLS 30K	120V 1P 2W	/5/2017 12/3/2017 SCALED PHOTOMETRY TYPE VS, BUG RATING: B3 - U0 - G1 10910.5 0 , 0 LED 116 2, 1.2, 0.5 0, 0, 0 POLE MOUNT D-Series VC Area Size 0 6de3854f-14f5-4e0d-8121-92573568d434 NOTE: DATA SHOWN IS ABSOLUTE FOR THE SAMPLE PROVIDED. 12441 80 120.1 VOLTS, 117.0 WATTS, 0.979 AMPS AMBIENT: 25.5	56
C	□	(108) ,	Contractor Select CNY LED Canopy P1=4,500lm	ELECTRONIC	CEILING	Lithonia Lighting, CNY LED P1 40K MVOLT	120V 1P 2W	/10/2018 3/4/2019 IES LM-79-08 TYPE VS, CUTOFF, BUG RATING: B2 - U3 - G1 LED 4476.3232421875 SURFACE 0.85, 0.85, 0.15 Contractor Select CNY LED Canopy 7e38f6e7-4099-4300-9a7e-f39f82af31a5	52
W1	⊢○	(1) LED,	DSXW1 LED WITH (1) 10 LED LIGHT ENGINES, TYPE T3S OPTIC, 3000K, @ 350mA WITH DIFFUSE DROP LENS.	ELECTRONIC	WALL	Lithonia Lighting, DSXW1 LED 10C 350 30K T3S MVOLT DDL	120V 1P 2W	/1/2014 1/11/2016 SCALED PHOTOMETRY TYPE IV, SHORT, BUG RATING: B0 - U2 - G1 1285.5 0 , 0 LED 13.3 Wall D-Series Wall Size 1 d964cde6-d765-419b-a875-494b4556ef9f SCALED FROM ABSOLUTE TEST: LTL25766	85
W2	⊢○	(1) LED,	DSXW1 LED WITH (1) 10 LED LIGHT ENGINES, TYPE T3M OPTIC, 3000K, @ 1000mA.	ELECTRONIC	CEILING	Lithonia Lighting, DSXW1 LED 10C 1000 30K T3M MVOLT	120V 1P 2W	/1/2014 1/11/2016 SCALED PHOTOMETRY TYPE IV, MEDIUM, BUG RATING: B1 - U0 - G1 3606.7 0 , 0 LED 38.8 Wall D-Series Wall Size 1 1391b448-a148-4b2a-8d7e-21f4281cef1b SCALED FROM ABSOLUTE TEST: LTL25762	11

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MILES LANE HOUSING

MidPen Housing Corp.
139/141 Miles Lane & 201 Kimberly Lane
Watsonville, California 95076

APNs: 016-491-01, 02 & 03, 016-111-44

JOB NO.
17148.1

PRINT DATE:
PLOT DATE: 06.12.2019
DRAWN BY: AH
CHECKED BY: HR
SET ISSUED:
1 PLANNING COMMENTS 06.10.2019

SHEET NAME
PHOTOMETRIC SITE PLAN

SHEET NO.
PH-1

FILE NAME: 17148 - PH-1

Figure 11 Photometric Plan

2. Summary of Findings: Impacts and Mitigations

Impact findings and mitigation measures identified in this report, the completed Initial Study checklist and narrative are summarized below. The mitigations listed below represent conditions for the Initial Study/Mitigated Negative Declaration for the proposed project.

Aesthetics
No significant impacts have been identified; no mitigation is necessary.

Agricultural and Forestry Resources
No significant impacts have been identified; no mitigation is necessary.

Air Quality
No significant impacts have been identified; no mitigation is necessary.

Biological Resources

Mitigation Measure BIO-1: Nesting Bird Avoidance or Conduct Preconstruction Surveys. If construction, grading, or other project-related improvements are scheduled during the nesting season of protected raptors and migratory birds, a focused survey for active nests of such birds shall be conducted by a qualified biologist within seven (7) days prior to the beginning of project-related activities. The results of the survey shall be sent to the City of Watsonville prior to the start of project activities. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for other small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos. Nesting seasons are typically defined as follows: i) March 15 to August 30 for smaller bird species such as passerines; ii) February 15 to August 30 for raptors.

The following measures shall be taken to avoid potential inadvertent destruction or disturbance of nesting birds on and near the project site as a result of construction-related vegetation removal and site disturbance:

a) To avoid impacts to nesting birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) shall occur outside the avian nesting season (generally prior to February 1 or after August 31). Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest.
b) If construction-related activities are scheduled to occur during the nesting season (generally February 1 through August 31), a qualified biologist shall conduct a habitat assessment and preconstruction nesting survey for nesting bird species no more than seven (7) days prior to initiation of work. A qualified wildlife biologist is an individual who possesses, at a minimum, a bachelor's or advanced degree, from an accredited university, with a major in biology, zoology, wildlife biology, natural resources science, or a closely related scientific discipline, at least two years of field experience in the biology and natural history of local plant, fish, and wildlife resources present at the development site, and knowledge of state and federal laws regarding the protection of sensitive and endangered species. The qualified biologist conducting the surveys shall be familiar with the breeding behaviors and nest structures of birds known to nest in the project site. Surveys shall be conducted at the appropriate times of day during periods of peak activity (i.e., early morning or dusk) and

shall be of sufficient duration to observe movement patterns. Surveys shall be conducted within the Project area and 250 feet of the construction limits for nesting non-raptors and 1,000 feet for nesting raptors, as feasible. If the survey area is found to be absent of nesting birds, no further mitigation would be required. However, if project activities are delayed by more than seven (7) days, an additional nesting bird survey shall be performed.

c) If pre-construction nesting bird surveys result in the location of active nests, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within the buffer zone established under BIO-2. Monitoring, by a qualified biologist, shall be required to ensure compliance with the relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented. Active nests found inside the limits of the buffer zones or nests within the vicinity of the project site showing signs of distress from Project activity, as determined by the qualified biologist, shall be monitored daily during the duration of the Project for changes in breeding behavior. If changes in behavior are observed (e.g., distress, disruptions), the buffer shall be immediately adjusted by the qualified biologist until no further interruptions to breeding behavior are detected. The nest protection buffers may be reduced if the qualified biologist determines in compliance with CDFW permit requirements (if any) that construction activities would not be likely to adversely affect the nest. If buffers are reduced, twice weekly monitoring may need to be conducted to confirm that construction activity is not resulting in detectable adverse effects on nesting birds or their young. The qualified biologist may implement an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact, subject to compliance with CDFW permits (if any). Construction shall not commence within the prescribed buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use. A report of the findings will be prepared by a qualified biologist and submitted to the City prior to the initiation of construction-related activities that have the potential to disturb any active nests during the nesting season.

d) City staff will not issue permits for ground disturbing activities until after the site has been surveyed by a qualified biologist to ensure that no active nest disturbance or destruction will occur as a result of the project. If necessary, nest protection buffers will be fenced off and active nest monitoring will be initiated prior to permit issuance.

Mitigation Measure BIO-2: Active Nest Buffer. The applicant shall designate active nests as "Ecologically Sensitive Areas" (ESA) and protect the nest (while occupied) during project activities with the establishment of a fence barrier surrounding the nest site.

a) Buffer distances for bird nests should be site specific and an appropriate distance, as determined by the qualified biologist. The buffer distances should be specified to protect the bird's normal behavior to prevent nesting failure or abandonment.

b) The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established.

c) Typical protective buffers between each identified nest site and construction site are as follows: 1) 300 feet for hawks, owls and eagles; 2) 50 feet for passerines.

d) The qualified biologist shall monitor the behavior of the birds (e.g., adults and young, when present) at the nest site to ensure that they are not disturbed by project activities.

e) Nest monitoring shall continue during project work until the young have completely left the nest site; as determined by the qualified biologist.
f) No habitat removal or modification shall occur within the ESA-fenced nest zone until the young have fully fledged and will no longer be adversely affected by the project.

Mitigation Monitoring BIO-1
Prior to issuance of any grading permit(s), the City shall review and approve the results of all pre-construction surveys and any measures recommended by the biologist to avoid sensitive species, which shall be noted on the final project plans. The project proponent shall not initiate any ground disturbing activity until applicant has submitted evidence to the City that Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 has been completed and are consistent with USFWS and/or CDFW permit requirements (if agency involvement is required). In addition, prior to ground disturbing activities, the City shall be provided with a written summary of the results of surveys by a qualified biologist to ensure that no active bird nest disturbance or destruction of breeding bat roosts will occur as a result of the project. If necessary, nest protection buffers will be fenced off and active nest monitoring will be initiated prior to permit issuance. A qualified biologist will also provide worker-awareness training prior to any work within aquatic habitats or adjacent upland habitat where California red-legged frog have potential to occur.

Mitigation Measure BIO-3: California Red-Legged Frog and Western Pond Turtle Avoidance. Implementation of the following mitigation measure would reduce potential impacts to CRLF and WPT to less-than-significant:

a) Silt fencing and orange construction fencing shall be erected along the project boundary, running parallel north to south along the perennial stream and around the seep wetland. The northern and southern ends of the silt and orange construction fencing shall extend at least 50 feet beyond the project site boundary to close off the work area. The bottom 4-6 inches of the fencing shall be buried to prevent wildlife from burrowing under the fence, allowing frogs or turtles entry to the work areas.
b) Once the fences are erected and within 48 hours of initiating project construction, a qualified wildlife biologist (as defined under Mitigation Measure BIO-1 shall conduct a preconstruction survey of the project site in the vicinity of the fences to ensure that no frogs or turtles are trapped inside the project construction zone. During this preconstruction survey the biologist shall also inspect the fence to make sure it is installed correctly. The project lead (i.e. foreman) should alert the biologist if the exclusion fence is damaged and/or otherwise non-functioning and initiate repairs as soon as possible. In consultation with the qualified biologist, the project lead may also initiate a second survey to relocate any CRLF or WPT within the project fencing to outside the work area.
c) Finally, a qualified biologist shall provide project contractors and construction crews with a worker-awareness program and oversee the placement of CRLF or WPT exclusion fencing before any work within aquatic habitats or adjacent upland habitats where CRLF or WPT have potential to occur. This program shall include a description of the species and its habitats, legal status and required protection, and all applicable mitigation measures.

Mitigation Measure BIO-4: Wetland Avoidance and BMP Implementation
Prior to grading, sturdy construction fencing shall be placed along the development boundaries and no construction activities shall be allowed outside of those boundaries. A qualified biologist shall confirm the extent to which jurisdictional wetlands will be impacted by the project. The biologist shall provide a written report, including photos, to the City of Watsonville, and, to the extent

required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no more than 30 days after this visit.

Mitigation Measure BIO-5: Develop and Implement a Habitat Restoration Plan.
The applicant shall develop and implement a Habitat Restoration Plan to be submitted and approved by the City of Watsonville prior to the issuance of final grading plans to mitigate for direct impacts to the willow riparian and seep wetland habitats, and to the 30-ft riparian buffer. The plan will address the following:

a) In order to mitigate for 0.040 acres removal of willow riparian habitat the Habitat Restoration Plan shall provide a minimum of 0.120 acres (a 3:1 ratio) of habitat restoration and enhancement the site.
b) In order to mitigate for 0.046 acres encroachment into the 30 ft. buffer the Habitat Restoration Plan shall provide a minimum of 0.046 acres (a 1:1 ratio) of habitat restoration and enhancement the site.
c) The Habitat Restoration Plan shall provide a minimum 108 sq. ft. (a 3:1 ratio for the seep wetland impacted area) of wetland creation adjacent to and contiguous with the existing seep wetland. In the event that the area of seep wetland to be impacted is determined to be greater than 36 sq. ft. as a result of implementation of BIO-4, then the Restoration Plan shall be amended to ensure that a minimum 3:1 ratio of replacement to impacted wetland shall be achieved.
d) The plan shall include performance criteria against which to measure the project's success, a minimum of five years of maintenance and monitoring shall be included in order to demonstrate attainment of the performance criteria, and yearly status reports to be submitted to the City of Watsonville, and, to the extent required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no later than December 31 of the year that monitoring occurred.
e) Upon the successful completion of the maintenance and monitoring period for the seep wetland, a Wetland Delineation utilizing standard Army Corps of Engineers protocols shall be performed to verify that the minimum 3:1 ratio of replacement to impacted wetland has been attained. In the event that less than 3:1 ratio has been attained, additional wetland creation shall be required to attain the ratio. The Wetland Delineation Report shall be submitted to the City of Watsonville, and, to the extent required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no more than 90 days after completion of the delineation of the created wetland.

Cultural Resources
Implementation of the following mitigation measure would ensure impacts are less than significant.

Mitigation Measure CUL-1: Conduct Archaeological Sensitivity Training for Construction Personnel. The Applicant shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall be carried out by a cultural resource professional with expertise in archaeology, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. The Applicant and/or qualified professional archaeologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The Applicant shall notify the City at least 48 hours

before holding the training and keep a log of all attendees. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary.

Mitigation Measure CUL-2: Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered. In the event that archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Monitored work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. In the event that the newly discovered artifacts are determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated. The Applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis.

Mitigation Measure CUL-3: Conduct Archeological Resource Spot Check during Grading and Earth- moving Activities in Younger Alluvial Sediments. The Applicant shall retain an archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards (qualified archaeologist) to conduct an archaeological spot check after excavation has reached two feet below ground surface. The check shall determine if excavations have exposed archaeological resources, or if there is significant potential remaining for discovery. Additional spot checks may be required at the discretion of the monitoring archaeologist. If archaeological resources are discovered during a spot check, a qualified archaeological monitor shall be required to monitor all subsequent ground moving activity. Multiple earth-moving construction activities may require multiple archaeological monitors, as deemed appropriate by the qualified archaeologist.

Mitigation Measure CUL-4: Prepare Report Upon Completion of Monitoring Services. The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the Applicant, the NWIC, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA.

Mitigation Measure CUL-5: Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during implementation of the proposed project, the County of Santa Cruz and the Applicant shall comply with State Health and Safety Code Section 6050.5. The County of Santa Cruz and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains

are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of the reburial with the NAHC and the project archaeologist shall file a record of the reburial with the CHRIS-NWIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Energy

No significant impacts have been identified; no mitigation is necessary.

Geology and Soils

Implementation of the following mitigation measure would ensure impacts are less than significant.

Mitigation Measure GEO-1: California Building Code. All construction activities shall meet the California Building Code regulations for seismic safety. Construction plans shall be subject to review and approval of the City prior to the issuance of a building permit. All work shall be subject to inspection by the City and must conform to all applicable code requirements and approved improvement plans prior to final inspection approval or the issuance of a certificate of occupancy. The Applicant shall be responsible for notifying construction contractors about California Building Code regulations for seismic safety.

Mitigation Measure GEO-2: Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan. The Applicant shall submit an Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan prepared by a registered professional engineer or qualified stormwater pollution prevention plan developer as an integral part of the grading plan. The Plan shall be subject to review and approval of the City prior to the issuance of a grading permit. The Plan shall include all erosion control measures to be used during construction, including run-on control, sediment control, and pollution control measures for the entire site to prevent discharge of sediment and contaminants into the drainage system. The Plan shall include the following measures as applicable:

a) Throughout the construction process, ground disturbance shall be minimized, and existing vegetation shall be retained to the extent possible to reduce soil erosion. All construction and grading activities, including short-term needs (equipment staging areas, storage areas and field office locations) shall minimize the amount of land area disturbed. Whenever possible, existing disturbed areas shall be used for such purposes.
b) All drainage ways, wetland areas and creek channels shall be protected from silt and sediment in storm runoff using appropriate BMPs such as silt fences, diversion berms and check dams. Fill slopes shall be stabilized and covered when appropriate. All exposed surface areas shall be mulched and reseeded. All cut and fill slopes shall be protected with hay mulch and/or erosion control blankets, as appropriate.
c) All erosion control measures shall be installed according to the approved plans prior to the onset of the rainy season but no later than October 15th. Erosion control measures shall

remain in place until the end of the rainy season but may not be removed before April 15th. The applicant shall be responsible for notifying construction contractors about erosion control requirement.

d) Example design standards for erosion and sediment control include, but are not limited to, the following: avoiding disturbance in especially erodible areas; minimizing disturbance on slopes exceeding 30 percent; using berms, swales, ditches, vegetative filter strips, and catchbasins to prevent the escape of sediment from the site; conducting development in increments; and planting bare soils to restore vegetative cover.
e) The applicant will also develop an inspection program to evaluate if there is any significant on-site erosion as a result of the rainfall. If there were problem areas at the site, recommendations will be made to improve methods to manage on-site erosion.

Mitigation Measure GEO-3: Conduct Paleontological Sensitivity Training for Construction Personnel. The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The Applicant and/or qualified professional paleontologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The Applicant shall notify the City at least 48 hours before holding the training and keep a log of all attendees. The training will include a handout and will focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

Mitigation Measure GEO-4: Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered. If paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the Applicant and the City. Work shall be allowed to continue outside of the buffer area. The Applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Greenhouse Gas Emissions

No significant impacts have been identified; no mitigation is necessary.

Hazards and Hazardous Materials

Implementation of the following mitigation measure would ensure impacts are less than significant.

Mitigation Measure HAZ-1: Asbestos Containing Materials. Per recommendations in the Phase I Environmental Site Assessment (ESA) performed for the project site, prior to any redevelopment or demolition activities the Applicant shall: (1) survey the existing on-site structures for the presence of asbestos containing materials (to be conducted by an OSHA-certified inspector); and (2) if

building elements containing any amount of asbestos are present, prepare a written Asbestos Abatement Plan describing activities and procedures for removal, handling, and disposal of these building elements using EPA- and/or OSHA-approved procedures, work practices, and engineering controls.

Mitigation Measure HAZ-2: Lead-based Paints. The Applicant shall test the existing on-site structures for lead-based paint. If present, the lead-based paint shall be removed and disposed of following lead abatement performance standards included in the U.S. Department of Housing and Urban Development Guidelines for Evaluation and Control of Lead-Based Paint program, in compliance with Title 8 California Code of Regulations (including Section 1532.1).

Hydrology and Water Quality
No significant impacts have been identified; no mitigation is necessary.

Land Use and Planning
No significant impacts have been identified; no mitigation is necessary.

Mineral Resources
No significant impacts have been identified; no mitigation is necessary.

Noise
No significant impacts have been identified; no mitigation is necessary.

Population and Housing
No significant impacts have been identified; no mitigation is necessary.

Public Services
No significant impacts have been identified; no mitigation is necessary.

Recreation
No significant impacts have been identified; no mitigation is necessary.

Transportation
Implementation of the following mitigation measure would ensure impacts are less than significant.

Mitigation Measure TRANS-1: Existing Plus Project Impacts on the Auto Center Drive & Marin Street Intersection. To improve driving conditions at the Auto Center Drive & Marin Street intersection, the City shall require the following improvements:

Auto Center Drive South of Marin Street

a) Provide approximately 280 feet of Striping Detail 22 (Centerline).
b) Provide approximately 350 feet of Striping Detail 27B (Right Edgeline) and create a painted bulb-out for vehicles entering from Auto Center Drive. Within the painted bulb-out, add 6" diagonal white striping with 15' spacing. The right edgeline striping would move the center of the road away from the curb allowing for better visibility.
c) Provide "Intersection Ahead" signage (W1-10e) with "Speed Sign" (W13-1P) with 20 mph speed and a custom "Limited Sight Distance" sign. Place at point of curvature for Northbound approach according to MUCTD Table 2C-4. This sign would warn drivers of the approaching intersection to be aware of cross traffic and to reduce speed.

Marin Street

a) Move the 12-inch stop bar closer to the curb line along with new "STOP" markings. This will allow drivers to pull up further into the new 8-foot parking lane to increase visibility along Auto Center Drive.
b) Provide approximately 75 feet of Striping Detail 22 (Centerline) to shift the westbound intersection approach to the north. This would allow for more visibility on the Auto Center Drive northbound approach.
c) Extend red curb on the south curb approximately 85 feet. This red curb would remove approximately three on-street parking spaces. This would prevent drivers from parking in the painted bulb-out.
d) Extend red curb on the north curb approximately 30 feet. This red curb would remove approximately one on-street parking space to allow more space for drivers to approach the intersection.

Auto Center Drive North of Marin Street

a) Extend red curb approximately 120 feet on the east curb and provide "No Parking Anytime" signage. This would remove approximately five (5) on-street parking spaces. Red curb would make parking illegal along the eastern curb allowing southbound sight distance to be unobstructed.
b) Provide "Intersection Ahead" signage (W1-10e) with "Speed Sign" (W13-1P) with 20 mph speed and a custom "Limited Sight Distance" sign. Place at point of curvature for southbound approach according to MUCTD Table 2C-4. This sign would warn drivers of the approaching intersection to be aware of cross traffic and to reduce speed.
c) Provide speed feedback sign similar to existing signage on east side of Auto Center Drive. Place at point of curvature for southbound approach according to MUCTD Table 2C-4.
d) Provide approximately 200 feet of Striping Detail 22 (Centerline) and Striping Detail 27B (Right Edgeline) for the Northbound approach. Right edgeline striping would be 8-feet from the curb. This striping would reduce confusion for vehicles traveling northbound.
e) Provide approximately 490 feet of Striping Detail 27B (Right Edgeline) for the Southbound approach. This striping would move the center of the road away from the curb allowing for better visibility.

With this mitigation measure, intersection design would meet AASHTO standards, and the Existing Plus Project impact on driver safety at the intersection would be reduced to a less-than-significant level.

Mitigation Measure TRANS-2: Construction Period Transportation Impacts. The Applicant shall submit a Construction Period Traffic Control Plan to the City for review and approval. The plan shall include traffic safety guidelines compatible with section 12 of the Caltrans Standard Specifications ("Construction Area Traffic Control Devices") to be followed during construction. The plan shall also specify provision of adequate signing and other precautions for public safety to be provided during project construction. In particular, the plan shall include a discussion of bicycle and pedestrian safety needs due to project construction and later, project operation. In addition, the plan shall address emergency vehicle access during construction. The applicant or their general contractor for the project shall notify the Public Works & Utilities Department and local emergency services (i.e., the Police and Fire Departments) prior to construction to inform them of the proposed construction schedule and that traffic delays may occur.

Prior to approval of a grading permit, the City shall review and approve the project Construction Period Traffic Control Plan. During construction, the City shall periodically verify that traffic control plan provisions are being implemented.

Tribal Cultural Resources

Implementation of the following mitigation measure would ensure impacts are less than significant.

Application of **Mitigation Measures CUL-1** through **CUL-4** would result in less than significant impacts with respect to tribal cultural resources.

Utilities and Service Systems

No significant impacts have been identified; no mitigation is necessary.

Wildfire

No significant impacts have been identified; no mitigation is necessary.

3. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture and Forestry	☐ Hazards & Hazardous Material	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☒ Transportation/Traffic
☒ Biological Resources	☐ Land Use/Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy Resources	☐ Noise	☐ Wildfire
☒ Geology and Soils	☐ Population/Housing	☐ Man. Findings of Sig.

4. Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☑ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Signature	Date
Justin Meek, AICP, Principal Planner	
Printed Name	Date

5. Evaluation of Environmental Impacts

(1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

(4) "Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as explained in [5] below, may be cross-referenced).

It is noted that many potential environmental impacts can be avoided or reduced through implementation of uniformly applied development policies, standards, or regulations – such as building and fire codes, design guidelines, a noise ordinance, a historic resource ordinance, a tree preservation ordinance, and other requirements that the lead agency applies uniformly toward all project proposals. Consistent with CEQA streamlining provisions (e.g., section 15183), these uniformly applied requirements are not distinguished as project-specific "mitigation measures," primarily because they have already been adopted to avoid or reduce potential environmental impacts of all future project proposals, not only the particular project being evaluated at the moment.

(5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. (CEQA Guidelines section 15063[b][1][c]). In this case, a brief discussion should identify the following:

(a) Earlier Analysis Used. Identify and state where they are available for review.

(b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

(c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

(7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

(8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(9) The explanation of each issue should identify:

(a) The significance criteria or threshold, if any, used to evaluate each question; and

(b) The mitigation measure identified, if any, to reduce the impact to less than significant.

6. Issues

6.1 Aesthetics

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, Would the project:				
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ("Glare" is defined in this EIR as the reflection of harsh bright light sufficient to cause physical discomfort or loss in visual performance and visibility.)			✓	

Conclusion: Regarding aesthetics, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. The project would not have a substantial adverse effect on a scenic vista, as the project vicinity is an urbanized, built-up land consisting of many residential units. The zoning of the area is RM-2, Multiple Residential-Medium Density. The project vicinity does not afford expansive scenic views and has no aesthetic features, such as prominent ridges or scenic vistas. The proposed project would create a 61-unit affordable housing development which includes the construction of 8 housing units and 2 rehabilitation buildings. The tallest building, which is building 6, would measure at 33 feet and 9 inches. Since there are no officially designated scenic views in the City of Watsonville, the project would replace a few existing buildings in an already urbanized area.

The project would not have a substantial adverse effect on a scenic vista, and impacts resulting from the project would be less than significant.

b. No Impact. The proposed project would not substantially degrade scenic resources because the project is not visible from a designated state scenic highway or an identified a scenic resource near the project site.

The project site is located on a partly developed site in a currently urbanized area and contains no scenic resources such as significant trees or unique rock outcroppings.

State Scenic Highways are designed by the California Department of Transportation (Caltrans) to promote the protection and enhancement of the natural scenic beauty of California's highways and adjacent corridors. Three designated or eligible for designation State Scenic Highways are within City limits. State Route (SR) 152 is eligible for the State Scenic Highway System and is officially designated as a scenic highway from the Merced-Santa Clara county line. The portion of SR 152 within the City along Main Street is located over 2,000 feet south of the project site. SR 129 is eligible for designation as a State Scenic Highway and is located over 1 mile southeast of the project site. California State Highway 1 is designated a State Scenic Highway through Watsonville and is located over 1.2 miles west of the project site. The project is not visible from any of these State Scenic Highways. Therefore, the proposed project would result in no impact on scenic resources.

c. Less than Significant Impact. Development of the proposed project could result in a significant impact if the project resulted in substantial degradation of the existing visual character or the quality of the site and its surroundings. The proposed 61-unit affordable housing development which consists of 8 separate buildings would alter the visual character of the project site by replacing a residential treatment facility with auxiliary structures. Buildings #1-7 will feature tuck under parking on the ground floor with two floors of residential units above. Building #2 will solely include two floors of housing units. Building #8 will be the community building. There are 143 residential parking spaces proposed with this project. The current site consists of a western section of the site that is developed while the remaining site is vacant and undeveloped. The architect provided a landscaping plan that includes trees and shrubs that would act as natural screening of the buildings.

The Watsonville General Plan has Goals which guide development.

- Goal 5.2 Community Appearance: Blend new development with recognized values of community appearance and scenic qualities, and ensure that new development enhances, rather than detracts from, its surroundings.
- Goal 5.6 Urban Design: Achieve high standards of street, site and building design that are both efficient, and aesthetically pleasing.
- Policy 5.A Project Design Review: The preservation of visual resources shall be accomplished through the design review process.
- Policy 5.B Design Consistency: The City shall review new development proposals to encourage high standards of urban design and to ensure that elements of architectural design and site orientation do not degrade or conflict with the appearance of existing structures.

The project would not change the character of the neighborhood which includes majority residential uses. The surrounding area is zoned RM-2, Multiple Residential-Medium Density. The City of Watsonville's Livable Community Residential Design Guidelines (2001) are intended to communicate the community's expectation for quality neighborhoods and housing and provide guidance for increasing density with greater attention paid to amenities and creating interconnected and livable neighborhoods. The Guidelines also provide direction for shaping new residential development and infill housing in existing neighborhoods. The proposed project is consistent with the Livable Community Design Guidelines.

The proposed project would meet these goals and policies in that it will be processed for Design Review with the City of Watsonville. Currently, the majority of the subject parcels are undeveloped

besides existing buildings on the northwest corner of the project (rehabilitation centers). These buildings, which are older, would be demolished and new buildings constructed in their place, which would incur design review by the City of Watsonville staff.

Because the project is located in an urbanized area, has a robust landscaping plan, and is consistent with the General Plan Goals and Policies, Residential Development Standards and Design Guidelines regarding landscaping and design, the project would not substantially degrade the existing visual character or quality of the site and its surroundings and the impact would be less than significant.

d. Less than Significant Impact. Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources, or by reflective surfaces (i.e., polished metal, window treatments). The proposed lighting is adequate to illuminate the project area. The lighting is consistent with what is typical for a urban residential setting. The parking lot lighting is sufficient for creating a fairly even distribution of light at low to moderate levels of intensity. The photometric analysis indicates the outdoor fixtures would create low and moderate light levels in and adjacent to the project location and should not create a glare nuisance. The project should not create a glare nuisance for the adjoining residential properties.

The project will replace two existing structures and replace them with 10 new buildings. The addition of 8 new buildings would increase the overall light in the project vicinity. However, the project would not create readily detectable glare along either the adjacent roads or surrounding residential uses. In addition, the project would be required to comply with the General Plan Urban Design and Scenic Resources element in that the project will meet Goal 5.2 "Community Appearance." Therefore, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The impact would be less than significant.

References:

Association of Monterey Bay Area Governments (AMBAG), 2010. Monterey Bay Area Mobility 2035. Available at: https://ambag.org/pdf/MTP%202010%20-%20Monterey%20Bay%20Area%20Mobility%202035.pdf (accessed October 4, 2019).

Caltrans, 2012. Scenic Highways. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/guidelines/scenic_hwy_guidelines_04-12-2012.pdf (accessed August 1, 2019).

WR&D Architects LLP, 2019. Photometric Site Plan (sheet PH-1).

6.2 Agriculture and Forest Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assess in impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51140 (g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

Conclusion: Regarding agricultural and forest resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a. No Impact. The project site and vicinity are located within an established, developed urban area that does not allow agriculture or forest uses per the City's General Plan. The map of Important Farmland in California (2016) prepared by the Department of Conservation does not identify the project site as being Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The site is classified as "Urban and Built-Up-Land" which is described as "occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel." Because the project site is classified as Urban and Built-Up-Land, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a nonagricultural use.

b. No Impact. No land within the City limits is zoned for agricultural use. The project site is zoned RM-2, which is intended for multi-family residential development at densities between 8 and 13.99 units per acre. Additionally, lands within the project are not under Williamson Act contracts nor would the project impact any lands under Williamson Act contracts. Therefore, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and no impact would occur.

c. No Impact. The project site and vicinity are located within an urban area and there is no forest land or timberland located on or near the project site. The project site is surrounded by residential, commercial and open space zoned land. The project site is currently partly developed with a rehabilitation residence and is surrounded by urbanized lands. Therefore, development of this project would have no impact on any timberland zoning.

d. No Impact. Refer to 6.2.c. The project site is currently partly developed with a rehabilitation residence. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, no impact would occur.

e. No Impact. Refer to Sections 6.2.a and 6.2.c. The project site is a currently partly developed site within a generally urbanized environment. The proposed project is surrounded by other residential and commercial uses. None of the surrounding sites contain existing forest or agricultural uses. Development of the project would not change the existing environment in a manner that will result in the conversion of forest land to a non-forest land use or agricultural land to a non-agricultural use because the existing zoning is residential. Therefore, no impact would occur.

References:

California Department of Conservation, Division of Land Resource Protection, 2017. Santa Cruz County Important Farmland 2018 (map). Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/scr16.pdf pdf (accessed July 23, 2019).

6.3 Air Quality

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				✓
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Conclusion: Regarding air quality, the proposed project would not result in any significant environmental impacts.

Documentation:

a. No Impact. In May 2017, the Monterey Bay Air Resources District (MBARD) adopted the *2012-2015 Air Quality Management Plan* (AQMP), which assesses and updates the elements of the *2008 AQMP and the Triennial Plan Revision 2009-2011*, including the air quality trends analysis, emission inventory, and mobile source programs (MBARD, 2017; MBARD, 2013).

The MBARD's *CEQA Air Quality Guidelines* provides a list of actions that are intended to ensure consistency with the AQMP (MBARD, 2008). The most applicable actions from the *CEQA Air Quality Guidelines* is assessing the proposed growth assumptions associated with a proposed project with the population and dwelling unit forecasts adopted by the Association of Monterey Bay Area Governments (AMBAG), since the AMBAG population and dwelling unit forecasts are used to generate emission forecasts upon which the AQMP is based. As such, projects that are consistent with the AMBAG's regional forecasts would be considered consistent with the AQMP. Another criterion for evaluating project consistency with the AQMP, is based on the project's potential to increase criteria air pollutant emissions. Projects that result in a significant increase in emissions, defined as in excess of MBARD significance thresholds, would also be considered to potentially conflict with or obstruct implementation of the AQMP.

The project is anticipated to house 212 residents, which is within the growth forecasts developed by the AMBAG's 2010 Monterey Bay Area Metropolitan Transportation Plan (MTP), *Monterey Bay Area Mobility 2035* (AMBAG, 2010).[1] As such, the project would not conflict with the AQMP with

[1] Although there is a new MTP for the region, the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy, the AQMP's air quality projections are based on the growth assumptions in the previous MTP. Therefore, consistency with regard to the AQMP is based on the previous iteration of the MTP.

regard to the first criterion. In addition, as described under response Section 6.3(b), the proposed project would not exceed the MBARD's construction or operational significance thresholds for criteria air pollutant emissions. Therefore, the project would not conflict with nor obstruct implementation of the AQMP. No impact would occur.

b. Less than Significant. The project is located within the North Central Coast Air Basin (NCCAB), which encompasses all of Santa Cruz, San Benito, and Monterey Counties. Efforts to attain state and federal air quality standards in the NCCAB are governed by the MBARD. Both the State of California and the federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as *criteria pollutants*). These pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM_{10}), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. Where the state and federal standards differ, California AAQS are more stringent than the national AAQS.

The United States Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), and MBARD assess the air quality of an area by measuring and monitoring the amount of pollutants in the ambient air and comparing pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into one of the following categories:

- **Attainment.** A region is "in attainment" if monitoring shows ambient concentrations of a specific pollutant are less than or equal to NAAQS or CAAQS. In addition, an area that has been re-designated from nonattainment to attainment is classified as a "maintenance area" for 10 years to ensure that the air quality improvements are sustained.

- **Nonattainment.** If the NAAQS or CAAQS are exceeded for a pollutant, the region is designated as nonattainment for that pollutant. It is important to note that some NAAQS and CAAQS require multiple exceedances of the standard in order for a region to be classified as nonattainment. Federal and state laws require nonattainment areas to develop strategies, plans, and control measures to reduce pollutant concentrations to levels that meet, or attain, standards.

- **Unclassified.** An area is unclassified if the ambient air monitoring data are incomplete and do not support a designation of attainment or nonattainment. Air pollution levels are measured at monitoring stations located throughout the air basin.

Table 1, *North Central Coast Air Basin Attainment Status*, summarizes the attainment status in the NCCAB for criteria pollutants.

Table 1. North Central Coast Air Basin Attainment Status

Pollutant	Federal	State
Ozone (O_3)	Nonattainment	Unclassified/Attainment
PM_{10}	Nonattainment	Unclassified
$PM_{2.5}$	Attainment	Unclassified/Attainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO_2)	Attainment	Unclassified
Sulfates	Attainment	--
Lead	Attainment	Unclassified/Attainment
Hydrogen Sulfide	Unclassified	--
Visibility Reducing Particles	Unclassified	--

Source: CARB, 2017

The proposed project would generate both short-term construction emissions and long-term operational emissions. The project's potential emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. As described in more detail below, the proposed project would not generate short-term or long-term emission that exceed MBARD-recommended criteria air pollutant thresholds.

Construction Emissions

The proposed project involves the construction of a residential substance abuse treatment facility, an outpatient rehabilitation facility, and a 61-unit affordable housing development over an approximately 16-month period, beginning in May 2020. Construction activities would disturb approximately 4.7 acres, and would include demolition, site preparation, grading, construction, paving, and architectural coating work. Approximately 1,300 cubic yards of debris from demolition activities would be removed during the demolition phase. Soil and earthwork quantities are anticipated to be balanced on site during grading.

The proposed project's potential construction emissions were estimated using CalEEMod. The project's construction schedule and equipment list were modified from CalEEMod default values based on information provided by the project Applicant, and are shown in Table 2.

Table 2. Construction Activity, Duration, and Typical Equipment

Construction Activity	Duration (days)(A)	Typical Equipment Used(B)
Demolition	5	Concrete/Industrial Saw, Dozer, Backhoe, Excavator
Site Preparation	18	Dozer, Backhoe
Grading	15	Excavator, Grader, Dozer, Backhoe
Building Construction	65	Crane, Forklift, Generator, Backhoe, Welder
Paving	20	Cement Mixer, Paver, Roller, Backhoe
Architectural Coating	13	Air Compressor

Source: MIG, 2019 (See Appendix A).
(A) Days refer to total active work days in the construction phase, not calendar days.
(B) The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each work day.

The proposed project's maximum daily unmitigated construction emissions are shown in

Table **3**. Please refer to Appendix A for CalEEMod output files and detailed construction emissions assumptions.

Table 3. Unmitigated Maximum Daily Criteria Air Pollutant Construction Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
2020	4.2	42.5	22.2	<0.0(A)	20.4	12.0
2021	58.2	19.0	19.1	<0.0(A)	1.6	1.1
Winter						
2020	4.2	42.5	22.2	<0.0(A)	20.4	12.0
2021	58.2	19.0	19.1	<0.0(A)	1.6	1.1
Threshold	--	--	--	--	**82**	--
Substantial?	--	--	--	--	**No**	--

Source: MIG, 2019 (See Appendix A).
(A) <0.0 does not mean emissions are zero; rather, it means emissions are greater than 0.00, but less than 0.1.

The proposed project would not result in construction emissions that exceed the MBARD's only established construction criteria air pollutant emission threshold of 82 lbs/day for PM_{10}. As stated in the MBARD's *CEQA Air Quality Guidelines*, "construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors, and front-end loaders that temporarily emit precursors of ozone (i.e., volatile organic compounds [VOC] or oxides of nitrogen [NOx], are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone AAQS" (MBARD, 2008; pg. 5-3). The project would utilize usual construction equipment, and therefore emissions of VOC/ROG and NOx would not hinder attainment of ozone standards in the NCCAB.

In addition, compliance with existing MBARD rules and regulations, such as Rule 402 (Nuisances), Rule 426 (Architectural Coatings), and Rule 425 (Use of Cutback Asphalt) would further minimize potential short-term criteria air pollutant emissions.

Operational Emissions

Upon completion of construction activities, the proposed project would operate as a residential substance abuse treatment facility, an outpatient rehabilitation facility, and a 61-unit affordable housing development. The operation of these land uses would generate emissions of regulated air pollutants from:

- **"Area" Sources.** The proposed land uses would generate emissions from small area sources, including landscaping equipment, the use of consumer products (e.g., paints, cleaners, and fertilizers) that result in the evaporation of chemicals into the atmosphere during product use.
- **Energy Use and Consumption.** The proposed land uses would generate emissions from the combustion of natural gas in water and space heating equipment.
- **Mobile Sources.** The proposed project site would generate emissions from vehicles traveling to and from the project site.

The proposed project's operational emissions were estimated using CalEEMod. The operational emissions generated in CalEEMod are based on the project's full first year of operation (i.e., 2022) using default data assumptions provided by CalEEMod, with the following project-specific modification:

- The default weekday trip generation rates for the residential substance abuse treatment facility, outpatient rehabilitation facility and 61-unit affordable housing development were replaced with

the trip generation rates contained in the Transportation Impact Analysis (TIA) prepared for the project by Kimley Horn. The weekend trip generation rates for the residential substance abuse treatment facility were also replaced by the rates contained in the TIA. According to the TIA, the proposed project would generate approximately 36 AM peak hour, 45 PM peak hour, and 422 gross daily trips on average weekdays. Consistent with standard Watsonville traffic engineering practices, the project will receive an existing use trip credit, which includes the existing single-family homes and a Residential Treatment Facility. The resulting gross existing trips are approximately 9 AM peak hour, 7 PM peak hour, and 70 daily trips. Therefore, the traffic analysis is based on the project generating a net of 27 new AM peak hour trips, 38 new PM peak hour trips, and 334 daily trips.

The proposed project's maximum daily unmitigated operational emissions are shown in Table **4**.

Table 4. Unmitigated Maximum Daily Criteria Air Pollutant Operational Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Area Sources	2.2	<0.0(A)	6.4	<0.0(A)	<0.0(A)	<0.0(A)
Energy Demand	<0.0(A)	0.2	0.1	<0.0(A)	<0.0(A)	<0.0(A)
Mobile Sources	1.1	5.3	12.1	<0.0(A)	2.9	0.8
Summer Total(B)	*3.4*	*5.5*	*18.7*	<0.0(A)	*2.9*	*0.8*
Winter						
Area Sources	3.2	0.1	6.4	<0.0(A)	<0.0(A)	<0.0(A)
Energy Demand	<0.0(A)	0.2	0.1	<0.0(A)	<0.0(A)	<0.0(A)
Mobile Sources	1.0	5.6	12.6	<0.0(A)	2.9	0.8
Winter Total	*3.3*	*5.8*	*19.2*	<0.0(A)	*2.9*	*0.8*
MBARD Daily Threshold	**137**	**137**	**500**	**150**	**82**	**--**
Potentially Significant?	**No**	**No**	**--**	**No**	**No**	**--**

Source: MIG, 2019 (See Appendix A).
(A) <0.0 does not mean emissions are zero; rather, it means emissions are greater than 0.00, but less than 0.1.
(B) Totals may not equal the sum of aggregate emissions due to rounding.

The proposed maximum daily unmitigated operational emissions would be below the MBARD's operational criteria air pollutant emissions thresholds. Therefore, operation of the proposed project would not generate operational-related emissions that exceed MBARD thresholds, and impacts would be less than significant.

c. Less than Significant. Some populations are more susceptible to the effects of air pollution than the population at large; these populations are defined as sensitive air quality receptors. Sensitive receptors include children, the elderly, the sick, and the athletic. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The sensitive air quality receptors adjacent or in close proximity to the perimeter of the project include:

- Single- and multi-family homes on Miles Lane, north of the project site;
- Single-family homes on Crespi Way, south of the project site;
- Single-family homes on Kimberly Lane, southwest of the project site; and
- Single-family homes on Santa Clara Street, west of the project site.

In addition to criteria air pollutants such as NOx (an ozone precursor), CO, PM_{10}, and $PM_{2.5}$, the U.S. EPA and CARB have classified certain pollutants as hazardous air pollutants (HAPs) and toxic air contaminants (TACs), respectively. These pollutants can cause severe health effects at very low concentrations, and many are suspected or confirmed carcinogens. The U.S. EPA has identified 187 HAPs, including such substances as arsenic and chlorine; CARB considers all U.S. EPA designated HAPS, as well as diesel particulate matter (DPM) emissions from diesel-fueled engines and other substances, to be a TAC.

During project construction, the heavy-duty, diesel-powered, off-road construction equipment, as well as diesel-powered vendor and haul tucks, would emit DPM as part of their exhaust emissions; however, these emissions would not result in pollutant concentrations that could generate substantial adverse health risks to adjacent sensitive receptors for several reasons.

First, as shown in
Table 3, the proposed project's emissions would be below all MBARD construction emissions thresholds. Second, project construction emission activities would only occur intermittently, between the hours of 7AM and 7 PM, Monday through Friday, and between the hours of 8 AM and 5 PM on Saturday, in accordance with a standard condition of project approval for all development projects. The intermittent nature of project construction activities would provide time for emitted pollutants to disperse on an hourly and daily basis according to the prevailing wind in the area. Finally, the project site is large, and the equipment used for project construction would be mobile – meaning that emission sources would move around the site and not expose the same receptor to pollutant concentrations continuously throughout the day, week, or construction-period as a whole. Furthermore, the proposed project would be required to comply with applicable MBARD rules and regulations, such as Rule 402 (Nuisances) and Rule 424 (National Emission Standards for Hazardous Air Pollutants (NESHAPS), which covers the handling of asbestos-containing materials that could be present at the project site.

The proposed project consists of short-term construction activities; emission sources would be temporary, intermittent, and move throughout the approximately 4.7-acre project site, and the project Applicant would comply with applicable MBARD rules and regulations. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

d. Less than Significant. Construction of the project would generate typical odors associated with construction activities, such fuel and oil odors, asphalt paving odors and painting/coating odors. The odors generated by the project would be intermittent and localized in nature and would disperse quickly. Therefore, the project would not create objectionable odors affecting a substantial number of people. This impact would be less than significant.

References:

Association of Monterey Bay Area Governments (AMBAG), 2010. *Monterey Bay Area Mobility 2035*. Available at: https://ambag.org/pdf/MTP%202010%20-%20Monterey%20Bay%20Area%20Mobility%202035.pdf (accessed October 4, 2019).

California Air Resources Board (CARB), 2017. Area Designations Map/State and National. Available at: http://www.arb.ca.gov/desig/adm/adm.htm (accessed December 28, 2018).

City of Watsonville, 2019. Watsonville Municipal Code. Available at: https://www.codepublishing.com/CA/Watsonville (accessed October 4, 2019).

Monterey Bay Air Resources District (MBARD), 2008. CEQA Air Quality Guidelines. Available at: https://www.mbard.org/files/f665829d1/CEQA_full+%281%29.pdf (accessed October 4, 2019).

MBARD, 2017. 2012-2015 Air Quality Management Plan. Available at: https://www.mbard.org/files/6632732f5/2012-2015-AQMP_FINAL.pdf (accessed October 4, 2019).

6.4 Biological Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		✓		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		✓		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Conclusion: The proposed project would not result in any significant environmental impacts to biological resources. A portion of the project site is located within a Riparian Corridor zone, however, there are no structures proposed within this area. The only features encroaching on the Riparian Corridor zone are a raised landscaped area and a retaining wall for a future bike path development which is an approved use by the City of Watsonville. Implementation of Mitigation Measures BIO-1 through BIO-5 would reduce potential impacts to less than significant levels. Regarding biological resources, the proposed project would not result in any significant environmental impacts.

Documentation:
Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,

policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact to Special Status Plants. Three special-status plant species were determined to have the potential to occur onsite due to the presence of grasslands and wetland seep habitat. These species include: Santa Cruz tarplant (*Holocarpha macradenia*), Choris' popcornflower (*Plagiobothrys chorisianus var. chorisianus*) and Santa Cruz clover (*Trifolium buckwestiourum*). A site visit was conducted in June 2019 by ECI, during the blooming period for each of these species. None were observed during the visit; therefore, no rare plants were determined to be present on site.

Less than Significant with Mitigation Incorporated to Special Status Wildlife. Two special-status bird species (i.e., Cooper's hawk and white-tailed kite) were determined to have the potential to forage and nest in the project area due to the presence of oak woodland habitat on site. Implementation of Mitigation Measure BIO-1 and BIO-2 would be required to reduce potential impacts to nesting birds to a less than significant level.

The relevant regulatory framework and a description of on-site resources and mitigation measures follows.

Special-Status Species Regulatory Framework:

Federal Endangered Species Act (FESA)

The FESA establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of the Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are charged with implementing and enforcing the FESA. USFWS has authority over terrestrial and continental aquatic species, and NOAA Fisheries has authority over species that spend all or part of their life cycle at sea, such as salmonids. Section 9 of FESA prohibits the unlawful "take" of any listed fish or wildlife species. Take, as defined by FESA, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." USFWS's regulations define harm to mean "an act which actually kills or injures wildlife." Such an act "may include "significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering" (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10. Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus. FESA does not extend the take prohibition to federally listed plants on private land, other than prohibiting the removal, damage, or destruction of such species in violation of state law.

Critical Habitat

Critical habitat is a term defined in the ESA as a specific geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund,

authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species' recovery. In many cases, this level of protection is similar to that already provided to species by the ESA jeopardy standard. However, areas that are currently unoccupied by the species but which are needed for the species' recovery are protected by the prohibition against adverse modification of critical habitat.

Migratory Bird Treaty Act of 1918 (MBTA)

The Federal Migratory Bird Treaty Act (MBTA) (16 USC. 703 et seq.), Title 50 Code of Federal Regulations (CFR) Part 10, prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. As used in the act, the term "take" is defined as meaning, "to pursue, hunt, capture, collect, kill or attempt to pursue, hunt, shoot, capture, collect or kill, unless the context otherwise requires." With a few exceptions, most birds are considered migratory under the MBTA. Disturbances that cause nest abandonment and/or loss of reproductive effort or loss of habitat upon which these birds depend would be in violation of the MBTA.

Essential Fish Habitat

Essential Fish Habitat (EFH) is regulated through the NMFS, a division of the National Oceanic and Atmospheric Administration (NOAA). Protection of Essential Fish Habitat is mandated through changes implemented in 1996 to the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to protect the loss of habitat necessary to maintain sustainable fisheries in the United States. The Magnuson-Stevens Act defines Essential Fish Habitat as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" [16 USC 1802(10)]. NMFS further defines essential fish habitat as areas that "contain habitat essential to the long-term survival and health of our nation's fisheries." Essential Fish Habitat can include the water column, certain bottom types such as sandy or rocky bottoms, vegetation such as eelgrass or kelp, or structurally complex coral or oyster reefs. Under regulatory guidelines issued by NMFS, any federal agency that authorizes, funds, or undertakes action that may affect EFH is required to consult with NMFS (50 CFR 600.920).

California Endangered Species Act (CESA)

Provisions of CESA protect state-listed threatened and endangered species. The California Department of Fish and Wildlife (CDFW) is charged with establishing a list of endangered and threatened species. CDFW regulates activities that may result in "take" of individuals (i.e., "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill"). Habitat degradation or modification is not expressly included in the definition of "take" under the California Fish and Game Code, but CDFW has interpreted "take" to include the killing of a member of a species which is the proximate result of habitat modification.

California Fully Protected Species and Species of Special Concern

The classification of California "fully protected" (CFP) was the CDFW's initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (fish at §5515, amphibians and reptiles at §5050, birds at §3503 and §3511, and mammals at §4150 and §4700) dealing with "fully protected" species state that these species "…may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize

the issuance of permits or licenses to take any fully protected species," although take may be authorized for necessary scientific research. This language makes the "fully protected" designation the strongest and most restrictive regarding the "take" of these species. In 2003, the code sections dealing with "fully protected" species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

California Species of Special Concern (CSC) are broadly defined as animals not listed under the FESA or CESA, but which are nonetheless of concern to the CDFW because they are declining at a rate that could result in listing or because they historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologist, and others, and is intended to focus attention on the species to help avert the need for listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required.

California Fish and Game Code 1600-1602

Sections 1600-1607 of the California Fish and Game Code require that a Notification of Lake or Streambed Alteration Agreement (LSAA) application be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." CDFW reviews the proposed actions in the application and, if necessary, prepares a LSAA that includes measures to protect affected fish and wildlife resources, including mitigation for impacts to bats and bat habitat.

California Fish and Game Code Sections 3503 and 3513

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under California Fish and Game Code Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto". Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

Non-Game Mammals

Sections 4150-4155 of the California Fish and Game Code protects non-game mammals, including bats. Section 4150 states "A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission". The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under California Fish and Game Code.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was created in 1977 with the intent to preserve, protect, and enhance rare and endangered plants in California (California Fish and Game Code sections

1900 to 1913). The NPPA is administered by CDFW, which has the authority to designate native plants as endangered or rare and to protect them from "take." CDFW maintains a list of plant species that have been officially classified as endangered, threatened or rare. These special-status plants have special protection under California law and projects that directly impact them may not qualify for a categorical exemption under CEQA guidelines.

Project Site Plant Communities and Associated Wildlife Habitats:

The project site contains eleven (11) habitat types, as shown in Figure 5: Habitats Observed in Study Area of the Biological Report and described below. A list of plant and wildlife species observed within the study area and their native or non-native status are provided in Appendix B.

Non-native Annual Grassland (1.28 acres). The hillsides of the study area are dominated by non-native annual grassland species including wild oat (*Avena fatua*), slender oat (*Avena barbata*), and wild raddish (*Raphanus sativus*). Wild rye (*Festuca perrennis*) occurs with these grassland species in a small area on the northern portion of the site and appears to have been part of erosion control methods.

Animals observed or expected to occur in non-native annual grassland habitats are generally species adapted to human activity and disturbance such as: Brewer's blackbird (*Euphagus cyanocephalus*), European starling (*Sturnus vulgaris*), red winged blackbird (*Agelaius* phoeniceus), turkey vulture (*Cathartes aura*) and black tailed jackrabbit (*Lepus californicus*).

Coast Live Oak Woodland Alliance (0.16 acres). Four areas within the proposed project site contain small to medium sized Coast Live Oak (*Quercus agrifolia*). Coast Live Oak habitat occurs on the eastern and south-western portion of the property and adjacent to the willow habitat, parallel to the **perennial stream.** This community is early to mid-successional and has an open canopy (approximately 20 to 30 cover). The understory is composed of primarily non-native annual grassland species including wild oat (*Avena barbata*) and slender oat (*Avena fatua*).

Developed Land (1.53 acres). Two parcels within the study area (016-491-01 and 016-491-02) contain developed lands. Developed areas include several houses, a warehouse, and ornamental landscaping.

Harding Grass Herbaceous Semi-Natural Alliance (0.88 acres). Low lying areas of the project site are dominated by a dense mat of Harding grass (*Phalaris aquatica*), a non-native perennial grass. Himalayan blackberry (*Rubus armeniacus*) occurs in patches with the Harding grass. A small area of this alliance occurs on the hillside of the eastern portion of the project site.

Himalayan Blackberry Shrubland Semi-Natural Alliance (0.17 acres). Himalayan blackberry (*Rubus Armeniacus*) alliance is found throughout the study area, particularly alongside the willow habitat. This habitat extends into the adjacent willow habitat as part of the understory, but completely dominates other areas of the project site.

Perennial Stream (0.07 acres). A perennial stream extends through the western section of the property (APN 016-491-03). Cat tail (*Typha sp.*) occurs within the slow-moving water, alongside species including: Himalayan blackberry (*Rubus Armeniacus*), cinquefoil (Potentilla sp.), panicled bulrush (*Scirpus microcarpus*) and dock (*Rumex sp.*). Downstream is mostly

unvegetated with a canopy of red willow (*Salix laevigata*). The channel is incised with little to no bank formation and cuts through the property in a straight line. The channel meets a storm water structure at the end of the parcel which could potentially cause water to backup into the channel during weather events. Although unlikely, it is possible that California red-legged frog (*Rana draytonii*) could access the site via the perennial stream.

This habitat is sensitive habitat, protected by General Plan Policy 9.F Wildlife Habitat Protection. This feature is under the Army Corps of Engineers (ACOE) jurisdictional wetland under Section 404 of the Federal Clean Water Act and is also subject to California Department of Fish and Wildlife (CDFW) and Regional Water Quality Control Board (RWQCB) jurisdiction.

Ruderal (0.12 acres). A disturbed portion of the site is occupied primarily by ruderal species, including non-native annual grasses, English plantain (*Plantago lanceolata*), and Himalayan blackberry (*Rubus armeniacus*). This portion of the project area has likely been disked and potentially graded in the past.

Seep Wetland Meadow (0.05 acres). On the eastern portion of the study area, a hillside seep feeds into the lower elevation meadow and perennial stream located on site. The meadow is dominated by common rush (*Juncus effuses*) and water parsley (*Oenanthe sarmentosa*). It was initially proposed that a leaking pipe could be resulting in the pooling water, however, radar studies determined that there is no existing pipe in the area.

This habitat is considered sensitive habitat and is protected by General Plan Policy 9.F Wildlife Habitat Protection. This feature is determined to be an Army Corps of Engineers jurisdictional wetland under Section 404 of the Federal Clean Water Act and is also subject to CDFW and RWQCB jurisdiction (ECI 2019).

Tall Fescue Herbaceous Semi-Natural Alliance (0.18 acres). The low-lying areas adjacent to the seep meadow are completely dominated by tall fescue (Festuca arundinacea).

Willow Woodland (0.32 acres). The southern portion of the property is dominated by Salix species. A dense canopy of red willow (*Salix laevigata*) is located adjacent to the **perennial stream**, occurring with English ivy (*Hedera helix*) and Himalayan blackberry (*Rubus armeniacus*). Arroyo willow (Salix lasiolepis) is found on the hillside west of the stream and also occurs with Himalayan blackberry (*Rubus Armeniacus*).

Weeping Willow (0.02 acres). A single weeping willow (*Salix babylonica*) occurs east of the red willow. Weeping willow is a non-native species and is not considered sensitive habitat.

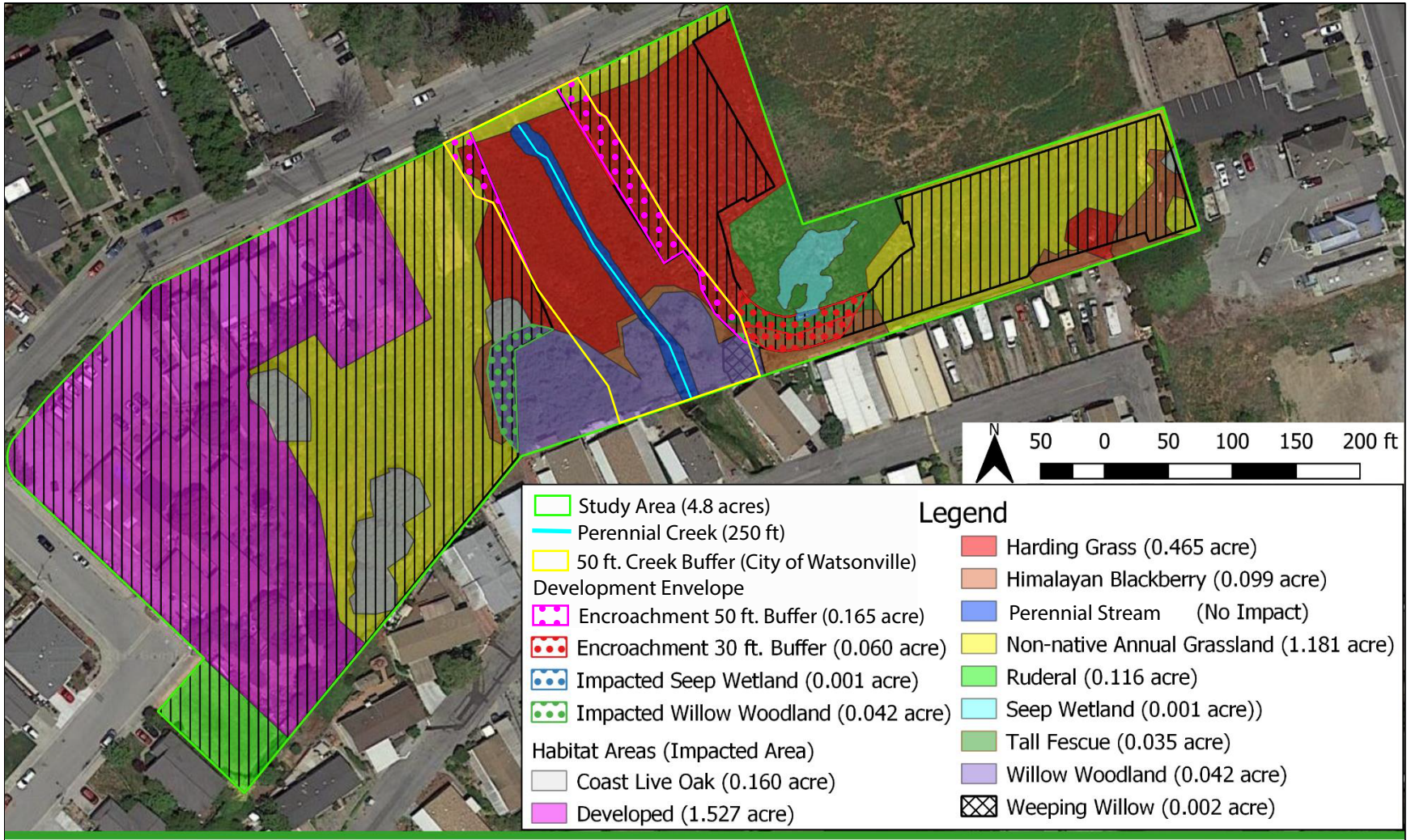

Figure 12 Impacts from Proposed Development

Watsonville, Santa Cruz County, California

APNs: 016-111-44, 016-491-01, 016-491-02, 016-491-03

Source Data: Google Sattelite, Santa Cruz County APN, Wald Runkle & Dost Architects LLC, ECI

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Special-Status Species with Potential to Occur on Project Site:

A search of current resource agency database records (e.g., CNDDB, CNPS Electronic Inventory, and USFWS Information for Planning and Consultation (IPaC) databases) within the Watsonville West and eight surrounding USGS 7.5-minute quadrangles. The potential occurrence of these species was then evaluated based on the habitat requirements of each species relative to the conditions observed during the general botanical survey and habitat evaluation conducted by ECI biologists. The following species were determined to have potential to occur within the study area, including the project footprint based on habitats found within the project site, CNDBB occurrences within a ten-mile radius of the Project Area, and observations of site conditions made during the biological surveys.

- Choris' popcornflower (Plagiobothrys chorisianus var. chorisianus),
- Cooper's hawk (*Accipiter coopertii*)
- Santa Cruz clover (*Trifolium buckwestiorum*)
- Santa Cruz tarplant (*Holocarpha macradenia*)
- White-tailed kite (*Elanus leucurus*)

Potential impacts and associated impact avoidance, minimization, and mitigation measures are discussed below.

Special-Status Plant Species

Special-status plants are defined here to include: (1) plants that are federal- or state-listed as rare, threatened or endangered, (2) federal and state candidates for listing, (3) plants assigned a Rank of 1 through 4 by the CNPS Inventory, and (4) plants that qualify under the definition of "rare" in the California Environmental Quality Act, section 15380.

A table of special-status plant species with the potential to occur on the project site is provided in Table 3 of the Biological Report. The study area was determined to provide no suitable habitat for 27 of 30 special-status plant species that were evaluated for their potential occurrence, based on the distance of the study area to previously recorded occurrences in the region, lack of typical vegetation types, disturbed habitat conditions, topography, elevation, soil types, and other species-specific habitat requirements.

Special-Status Wildlife Species

Special-status wildlife species include those species listed as endangered or threatened under the FESA or CESA; candidates for listing by the USFWS or CDFW; California fully protected and species of special concern; non-game mammals protected by Sections 4150-4155 of the CFGC; and nesting birds protected by the CDFW under CFGC Sections 3503 and 3513.

The Biological Report prepared for the project determined that special-status wildlife species were considered absent or to have a low potential to occur within the study area based on a review of the USFWS, CNDDB, CNPS, NOAA Fisheries, and University of California databases, the biologist's knowledge of sensitive species within the City of Watsonville, and an assessment of the types of habitats within the project site. According to the report, two special-status wildlife species have low potential to occur within or near the project area. These species include: Cooper's hawk (*Accipiter coopertii*) and white-tailed kite (*Elanus leucurus*). This determination was made due to the presence of essential habitat requirements for the species, the presence of known occurrences within 10 miles of the project area, and/or the project area's location within the species known range of distribution.

It should be noted that there are two CNDDB-documented occurrences of special-status amphibian species within a five-mile radius of the study area. These species include California red-legged frog (*Rana draytonii*) and Western pond turtle (*Emys marmorata*). These species have low potential to occur within the study area due to habitat suitability as well as distance and connectivity to other occupied waterbodies. The study area contains a perennial stream which could potentially provide regular inundation required for California red-legged frog and is confluent with the Watsonville slough which is occupied by CRLF.

There is a CRLF occurrence approximately .70 miles from the project site. With three more occurring within 5 miles of the site. The closest occurrence for Western pond turtle is approximately .50 miles from the project site. However, it is very unlikely that any WPT will occur on site due to the high level of development and frequently disked parcels in between the occurrence and the project site. Although it is unlikely that either of these species will occur onsite, it is possible and therefore mitigation for CRLF and WPT has been included in order to minimize potential impacts to less than significant.

Species with potential to occur within the study area are discussed in detail below.

Cooper's Hawk *(Accipiter coopertii)*. CDFW Watch List. Cooper's hawk is a medium sized raptor that ranges across North America (NGS 1983). Breeding typically occurs in mature broadleaf or coniferous forests from early April to June, with molting typically beginning in late June (Bent 1937, Brown and Amadon 1968). While some populations require large tracts of land, others have been observed using small woodlots and forest tracts, including within urban/suburban areas where the bird appears to be tolerant of human activities (Hennessy 1978, Herron et al. 1985, Campbell et al. 1990, Peterjohn and Rice 1991, Rosenfield et al. 1991).

There is one recorded occurrence for this species within a ten-mile radius according to CNDDB records at Crestview Park, an urban park within the Watsonville city limits less than one half mile from the project site. Therefore, it is possible that Cooper's hawk may use the project site for foraging and nesting in the meadow and oak woodland habitat present on site, respectively.

White-tailed kite *(Elanus leucurus)*. USFWS Bird of Conservation Concern; California Fully Protected. The white-tailed kite is a medium sized raptor that occupies low-elevation grassland, agricultural, wetland, oak woodland and oak savanna habitats (Dunk 1995). The species is distributed throughout the coastal foothills and valleys along the entire length of the state, throughout the Central Valley, and into the foothills of the Sierra Nevada (Dunk 1995). The species hunts mostly by flying over open country, pausing frequently to hover and study the ground; on sighting prey, it dives, catching prey in its talons (Kaufman 1996). Nest site is in top of tree, usually 20-50' above ground, sometimes higher or lower depending on available sites. Coast live oak is often preferred for nesting habitat. Nest (built by both sexes) is a good-sized platform of sticks and twigs, lined with grasses, weeds and moss. The bird feeds on mostly small rodents that are active by day in open country, particularly voles and house mice (Dunk 1995). Other items in diet, mostly of minor importance, include pocket gophers, harvest mice, rats, shrews, young rabbits, sometimes birds. Rarely may eat snakes, lizards, frogs, large insects (Kaufman 1996).

There is one recorded occurrence for this species within a ten miles radius according to CNDDB records at the Elkorn Slough Reserve, located approximately 7 miles from the project site. Therefore, it is possible that white-tailed kite may use the project site for foraging and nesting in the meadow and oak woodland habitat present on site, respectively.

Other Protected Nesting Birds. Vegetation communities within the study area provide suitable nesting habitat for common, as well as special-status resident and passerine and raptor species. Nesting birds may nest within trees, shrubs, shallow scrapes on bare ground, and man-made structures within the study area. Numerous passerines were noted during the field survey. If construction activities occur during the avian breeding season (generally February to August), injury to individuals or nest abandonment could occur. In addition, noise and increased construction activity could temporarily disturb nesting or foraging activities, potentially resulting in the abandonment of nest sites. The loss of an active nest of common or special-status bird species would be considered a violation of Fish and Game Code sections 3503, 3503.5, and 3513.

Mitigation:

Mitigation Measure BIO-1: Nesting Bird Avoidance or Conduct Preconstruction Surveys. If construction, grading, or other project-related improvements are scheduled during the nesting season of protected raptors and migratory birds, a focused survey for active nests of such birds shall be conducted by a qualified biologist within seven (7) days prior to the beginning of project-related activities. The results of the survey shall be sent to the City of Watsonville prior to the start of project activities. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for other small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos. Nesting seasons are typically defined as follows: i) March 15 to August 30 for smaller bird species such as passerines; ii) February 15 to August 30 for raptors.

The following measures shall be taken to avoid potential inadvertent destruction or disturbance of nesting birds on and near the project site as a result of construction-related vegetation removal and site disturbance:

a) To avoid impacts to nesting birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) shall occur outside the avian nesting season (generally prior to February 1 or after August 31). Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest.
b) If construction-related activities are scheduled to occur during the nesting season (generally February 1 through August 31), a qualified biologist shall conduct a habitat assessment and preconstruction nesting survey for nesting bird species no more than seven (7) days prior to initiation of work. A qualified wildlife biologist is an individual who possesses, at a minimum, a bachelor's or advanced degree, from an accredited university, with a major in biology, zoology, wildlife biology, natural resources science, or a closely related scientific discipline, at least two years of field experience in the biology and natural history of local plant, fish, and wildlife resources present at the development site, and knowledge of state and federal laws regarding the protection of sensitive and endangered species. The qualified biologist conducting the surveys shall be familiar with the breeding behaviors and nest structures of birds known to nest in the project site. Surveys shall be conducted at the appropriate times of day during periods of peak activity (i.e., early morning or dusk) and shall be of sufficient duration to observe movement patterns. Surveys shall be conducted within the Project area and 250 feet of the construction limits for nesting non-raptors and 1,000 feet for nesting raptors, as feasible. If the survey area is found to be absent of nesting birds, no further mitigation would be required. However, if project activities are delayed by more than seven (7) days, an additional nesting bird survey shall be performed.

c) If pre-construction nesting bird surveys result in the location of active nests, no site disturbance (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within the buffer zone established under BIO-2. Monitoring, by a qualified biologist, shall be required to ensure compliance with the relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented. Active nests found inside the limits of the buffer zones or nests within the vicinity of the project site showing signs of distress from Project activity, as determined by the qualified biologist, shall be monitored daily during the duration of the Project for changes in breeding behavior. If changes in behavior are observed (e.g., distress, disruptions), the buffer shall be immediately adjusted by the qualified biologist until no further interruptions to breeding behavior are detected. The nest protection buffers may be reduced if the qualified biologist determines in compliance with CDFW permit requirements (if any) that construction activities would not be likely to adversely affect the nest. If buffers are reduced, twice weekly monitoring may need to be conducted to confirm that construction activity is not resulting in detectable adverse effects on nesting birds or their young. The qualified biologist may implement an alternative monitoring schedule depending on the construction activity, season, and species potentially subject to impact, subject to compliance with CDFW permits (if any). Construction shall not commence within the prescribed buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use. A report of the findings will be prepared by a qualified biologist and submitted to the City prior to the initiation of construction-related activities that have the potential to disturb any active nests during the nesting season.
d) City staff will not issue permits for ground disturbing activities until after the site has been surveyed by a qualified biologist to ensure that no active nest disturbance or destruction will occur as a result of the project. If necessary, nest protection buffers will be fenced off and active nest monitoring will be initiated prior to permit issuance.

Mitigation Measure BIO-2: Active Nest Buffer. The applicant shall designate active nests as "Ecologically Sensitive Areas" (ESA) and protect the nest (while occupied) during project activities with the establishment of a fence barrier surrounding the nest site.

a) Buffer distances for bird nests should be site specific and an appropriate distance, as determined by the qualified biologist. The buffer distances should be specified to protect the bird's normal behavior to prevent nesting failure or abandonment.
b) The qualified biologist shall have authority to order the cessation of all nearby project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established.
c) Typical protective buffers between each identified nest site and construction site are as follows: 1) 300 feet for hawks, owls and eagles; 2) 50 feet for passerines.
d) The qualified biologist shall monitor the behavior of the birds (e.g., adults and young, when present) at the nest site to ensure that they are not disturbed by project activities.
e) Nest monitoring shall continue during project work until the young have completely left the nest site; as determined by the qualified biologist.
f) No habitat removal or modification shall occur within the ESA-fenced nest zone until the young have fully fledged and will no longer be adversely affected by the project.

Mitigation Monitoring BIO-1. Prior to issuance of any grading permit(s), the City shall review and approve the results of all pre-construction surveys and any measures recommended by the biologist to avoid sensitive species, which shall be noted on the final project plans. The project proponent shall not initiate any ground disturbing activity until applicant has submitted evidence to the City that Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 has been completed and are consistent with USFWS and/or CDFW permit requirements (if agency involvement is required). In addition, prior to ground disturbing activities, the City shall be provided with a written summary of the results of surveys by a qualified biologist to ensure that no active bird nest disturbance or destruction of breeding bat roosts will occur as a result of the project. If necessary, nest protection buffers will be fenced off and active nest monitoring will be initiated prior to permit issuance. A qualified biologist will also provide worker-awareness training prior to any work within aquatic habitats or adjacent upland habitat where California red-legged frog have potential to occur.

Mitigation Measure BIO-3: California Red-Legged Frog and Western Pond Turtle Avoidance. Implementation of the following mitigation measure would reduce potential impacts to CRLF and WPT to less-than-significant:

a) Silt fencing and orange construction fencing shall be erected along the project boundary, running parallel north to south along the perennial stream and around the seep wetland. The northern and southern ends of the silt and orange construction fencing shall extend at least 50 feet beyond the project site boundary to close off the work area. The bottom 4-6 inches of the fencing shall be buried to prevent wildlife from burrowing under the fence, allowing frogs or turtles entry to the work areas.
b) Once the fences are erected and within 48 hours of initiating project construction, a qualified wildlife biologist (as defined under Mitigation Measure BIO-1 shall conduct a preconstruction survey of the project site in the vicinity of the fences to ensure that no frogs or turtles are trapped inside the project construction zone. During this preconstruction survey the biologist shall also inspect the fence to make sure it is installed correctly. The project lead (i.e. foreman) should alert the biologist if the exclusion fence is damaged and/or otherwise non-functioning and initiate repairs as soon as possible. In consultation with the qualified biologist, the project lead may also initiate a second survey to relocate any CRLF or WPT within the project fencing to outside the work area.
c) Finally, a qualified biologist shall provide project contractors and construction crews with a worker-awareness program and oversee the placement of CRLF or WPT exclusion fencing before any work within aquatic habitats or adjacent upland habitats where CRLF or WPT have potential to occur. This program shall include a description of the species and its habitats, legal status and required protection, and all applicable mitigation measures.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated.

The project site contains both riparian and wetland features. General Plan Policy 9.F (Wildlife Habitat Protection), indicates that areas containing biodiverse wildlife species and sensitive resources, are required by the City to implement habitat protection measures. Per Implementation Measure 9.F.1, impacts to important wildlife habitat areas shall be identified as part of the City's development review and environmental review processes, and appropriate mitigations shall be

considered. Mitigation measures to be considered include: designation of sensitive areas as open space, restriction of new development on lands that provide important wildlife habitat, setback requirements, habitat conservation plans, and habitat mitigation banking. Lands within the urban limit line that provide important wildlife habitat include riparian corridors.

In accordance with the definition for a riparian corridor set forth in WMC Section 7-6.152, an appropriate setback from development to the bankfull flowline of a perennial stream is 50 feet. As shown on the proposed site plan, no buildings are proposed within this area.

A proposed retaining wall to provide a landscaped open space area with artificial turf for informal open play next to the community building (Building #8) encroaches into this environmental management area by up to 16 feet. The City also requested that the applicant move the proposed retaining wall next to the parking lot for residential building #6 towards the stream and into the buffer area to allow the Public Works & Utilities Department to be able to install a future trail link on a flat terrain along the Upper Watsonville Slough, in accordance with the alignment shown for Segment 9.4 in the City's Trails and Bicycle Master Plan (2012). These activities represent passive activities allowed by the City for the enjoyment of riparian corridors and consistent with City policies.

Two project components, the access road and the trail easement required by the City of Watsonville, are encroaching within 30-feet of the environmental management area surrounding the seep wetland. The total encroachment of the access road and trail is approximately 0.055 acres. However, as previously stated, the City categorizes the trail easement as a passive use and would be consistent with the City's General Plan. Therefore, the encroachment of approximately 0.009 acres into the 30-foot buffer would not be considered a significant impact. Total encroachment within 50-feet of the riparian environmental management area for the perennial stream is approximately 0.106 acres. Additionally, a raised landscape component would also be within 50-feet of the riparian environmental management area. The total encroachment of 0.106 acres is inclusive of the raised landscape component.

The construction of the access road is potentially significant, causing approximately 0.046 acres of encroachment on the seep wetland and would require approval from the City. However, the encroachment only effects non-native species and would not be considered sensitive habitat.

The incorporation of the following Mitigation Measures BIO-5 and BIO-6 would reduce impacts to less than significant. Additionally, MidPen Housing, and Watsonville Wetlands Watch intend to collaborate on future habitat restoration and enhancement efforts at an offsite wetland located outside of the project footprint and at the lower reach of the onsite perennial stream.

Three sensitive natural vegetation communities, seep wetland, willow woodland, and perennial stream occur on the project site. A portion of these communities will be impacted by project activities. The project would be required to comply with standard City construction grading and drainage practices, as described in City Municipal Code Title 7, Chapter 6, which would minimize potential impacts on these sensitive communities.

Regulatory framework, a description of on-site resources and mitigation measures follow.

Sensitive Natural Vegetation Community Regulatory Framework:

California Fish and Game Code Section 1600-1603

Streams, lakes, and riparian vegetation, as habitat for fish and other wildlife species, are subject to jurisdiction by the CDFW under Sections 1600-1616 of the California Fish and Game Code. Any activity that will do one or more of the following: (1) substantially obstruct or divert the natural flow of a river, stream, or lake; (2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream", which includes creeks and rivers, is defined in the California Code of Regulations ("CCR") as follows: "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life". This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). In addition, the term stream can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFW 1994). Riparian vegetation is defined as, "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself" (CDFW 1994). In addition to impacts to jurisdictional streambeds, removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from the CDFW.

Sensitive Natural Communities

Sensitive natural communities are vegetation communities and habitats that are either unique in constituent components, of relatively limited distribution in the region, or of particularly high wildlife value. These communities may or may not necessarily contain special-status species. Sensitive natural communities are usually identified in local or regional plans, policies or regulations, or by the CDFW (i.e., CNDDB) or the USFWS. The CNDDB identifies a number of natural communities as rare, which are given the highest inventory priority. Impacts to sensitive natural communities and habitats must be considered and evaluated under the CEQA California Code of Regulations (CCR): Title 14, Div. 6, Chap. 3, Appendix G.

Seep Wetland

Direct impacts due to the removal of seep wetland habitat are anticipated due to the construction of the project access road. These impacts are subject to the jurisdiction of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife and the Regional Water Quality Control Board. Approximately 0.001 acres are anticipated to be removed as part of project activities and is considered a potentially significant impact.

Willow Woodland

Approximately 0.042 acres of willow woodland will be removed due to project activities. A small portion of this woodland, approximately 0.002 acres, includes weeping willow (*Salix babylonica*), a non-native species that would not be considered a sensitive resource. However, 0.040 acres of sensitive willow woodland would be removed due to project activities and would be considered a significant impact. The project would be required to acquire all applicable permits and comply with all state jurisdictional standards, including but not limited to obtaining a Lake and Streambed Alteration Agreement from CDFW, a 404 permit from the US Army Corps of Engineers, and a 401 Water Quality Certification from the Regional Water Quality Control Board.

Perennial Stream
The perennial stream that transverses the proposed project site falls under the City of Watsonville's jurisdiction under Municipal Code section 7-6.152 and requires setbacks for riparian corridors:
"Riparian corridor" shall refer those areas which fall into one of the following three (3) categories:

a) An area extending fifty (50') feet, measured horizontally, from each side of a perennial stream. Distance shall be measured from the top of the existing bankfull flowline;
b) An area extending thirty (30') feet, measured horizontally, from each side of an intermittent stream. Distance shall be measured from the top of the existing bankfull flowline; or
c) An area extending thirty (30') feet from the highwater mark of a marsh or a natural body of standing water."

Mitigation:

Mitigation Measure BIO-4: Wetland Avoidance and BMP Implementation
Prior to grading, sturdy construction fencing shall be placed along the development boundaries and no construction activities shall be allowed outside of those boundaries. A qualified biologist shall confirm the extent to which jurisdictional wetlands will be impacted by the project. The biologist shall provide a written report, including photos, to the City of Watsonville, and, to the extent required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no more than 30 days after this visit.

Mitigation Measure BIO-5: Develop and Implement a Habitat Restoration Plan.
The applicant shall develop and implement a Habitat Restoration Plan to be submitted and approved by the City of Watsonville prior to the issuance of final grading plans to mitigate for direct impacts to the willow riparian and seep wetland habitats, and to the 30-ft riparian buffer. The plan will address the following:

a) In order to mitigate for 0.040 acres removal of willow riparian habitat the Habitat Restoration Plan shall provide a minimum of 0.120 acres (a 3:1 ratio) of habitat restoration and enhancement the site.
b) In order to mitigate for 0.046 acres encroachment into the 30 ft. buffer the Habitat Restoration Plan shall provide a minimum of 0.046 acres (a 1:1 ratio) of habitat restoration and enhancement the site.
c) The Habitat Restoration Plan shall provide a minimum 108 sq. ft. (a 3:1 ratio for the seep wetland impacted area) of wetland creation adjacent to and contiguous with the existing seep wetland. In the event that the area of seep wetland to be impacted is determined to be greater than 36 sq. ft. as a result of implementation of BIO-4, then the Restoration Plan shall be amended to ensure that a minimum 3:1 ratio of replacement to impacted wetland shall be achieved.
d) The plan shall include performance criteria against which to measure the project's success, a minimum of five years of maintenance and monitoring shall be included in order to demonstrate attainment of the performance criteria, and yearly status reports to be submitted to the City of Watsonville, and, to the extent required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no later than December 31 of the year that monitoring occurred.

e) Upon the successful completion of the maintenance and monitoring period for the seep wetland, a Wetland Delineation utilizing standard Army Corps of Engineers protocols shall be performed to verify that the minimum 3:1 ratio of replacement to impacted wetland has been attained. In the event that less than 3:1 ratio has been attained, additional wetland creation shall be required to attain the ratio. The Wetland Delineation Report shall be submitted to the City of Watsonville, and, to the extent required by project permits, to the Army Corps of Engineers, Regional Water Quality Control Board, and the California Department of Fish and Wildlife no more than 90 days after completion of the delineation of the created wetland.

c) Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impacts with Mitigation Incorporated. There are two potential federal and state jurisdictional features within the western and eastern portions of the project site. The perennial stream and wetland seep located on site are subject to impacts due to project activities. As discussed above, the project would be required to comply with standard City construction grading and drainage practices, as described in City Municipal Code Title 7, Chapter 6. In combination with Mitigation Measures BIO-4 and 5 above, potential impacts would be reduced to less than significant.

Regulatory framework, a description of on-site resources and mitigation measures follows.

Protected Aquatic Resource Regulatory Framework:

The Clean Water Act (CWA)

The CWA is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the U.S. Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA and the California State Water Resources Control Board enforces Section 401.

Section 404. As part of its mandate under Section 404 of the CWA, the EPA regulates the discharge of dredged or fill material into "waters of the U.S." "Waters of the U.S." include territorial seas, tidal waters, and non-tidal waters in addition to wetlands and drainages that support wetland vegetation, exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high-water marks. Wetlands are defined as those areas "that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). The discharge of dredged or fill material into waters of the U.S. is prohibited under the CWA except when it is in compliance with Section 404 of the CWA. Enforcement authority for Section 404 was given to the USACE, which it accomplishes under its regulatory branch. The EPA has veto authority over the USACE's administration of the Section 404 program and may override a USACE

decision with respect to permitting. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions.

Section 401. Any applicant for a federal permit to impact waters of the U.S. under Section 404 of the CWA, including Nationwide Permits where pre-construction notification is required, must also provide to the USACE a certification or waiver from the State of California. The "401 Certification" is provided by the State Water Resources Control Board (State Water Board) through the local Regional Water Quality Control Board (RWQCB). The RWQCB issues and enforces permits for discharge of treated water, landfills, storm-water runoff, filling of any surface waters or wetlands, dredging, agricultural activities and wastewater recycling. The RWQCB recommends the "401 Certification" application be made at the same time that any applications are provided to other agencies, such as the USACE, USFWS, or NOAA Fisheries. The application is not final until completion of environmental review under the CEQA. The application to the RWQCB is similar to the pre-construction notification that is required by the USACE. It must include a description of the habitat that is being impacted, a description of how the impact is proposed to be minimized and proposed mitigation measures with goals, schedules, and performance standards. Mitigation must include a replacement of functions and values, and replacement of wetland at a minimum ratio of 2:1, or twice as many acres of wetlands provided as are removed. The RWQCB looks for mitigation that is on site and in-kind, with functions and values as good as or better than the water-based habitat that is being removed.

National Pollutant Discharge Elimination System (NPDES)

The NPDES program requires permitting for activities that discharge pollutants into waters of the United States. This includes discharges from municipal, industrial, and construction sources. These are considered point-sources from a regulatory standpoint. Generally, these permits are issued and monitored under the oversight of the State Water Resources Control Board (SWRCB) and administered by each regional water quality control board. Construction activities that disturb one acre or more (whether a single project or part of a larger development) are required to obtain coverage under the state's General Permit for Dischargers of Storm Water Associated with Construction Activity. All dischargers are required to obtain coverage under the Construction General Permit. The activities covered under the Construction General Permit include clearing, grading, and other disturbances. The permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) with a monitoring program, see Mitigation Measure GEO-2. The proposed project would require coverage under the Construction General Permit.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act (Porter-Cologne Act) (California Water Code § 13260) requires "any person discharging waste, or proposing to discharge waste, within any region that could affect the "Waters of the State" to file a report of discharge with the RWQCB through an application for waste discharge. Waters of the State are defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The RWQCB protects all waters in its regulatory scope, but has special responsibility for isolated wetlands and headwaters. These water bodies have high resource value, are vulnerable to filling, and may not be regulated by other programs, such as Section 404 of the CWA. If a project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the Water Board has the option to regulate the dredge and fill activities under its state authority through its Waste Discharge Requirements (WDR) program.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. No designated wildlife migration corridors are known to be present on the project site. Localized movements of common, non-status wildlife may occur through the project site and neighboring habitats, but no major migrations are expected to occur across the project site. Surrounding uses are primarily developed with major roads and highways, commercial and industrial development, and fenced agricultural land separated by approximately 1.2 miles to the nearest undeveloped open space area, the Watsonville State Wildlife Area. The high level of development and frequent disking of the surrounding parcels makes it an unlikely option for wildlife migrations.

The project site does not function as a wildlife habitat linkage or movement corridor, nor would project implementation adversely affect any offsite designated wildlife habitat linkage or movement corridor. Regional movement of common wildlife species through the project site is limited due to surrounding development. In addition, the project site does not support any native wildlife nursery sites. Thus, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. As a result, construction and operation of the project is not expected to substantially affect breeding productivity or population viability of any common species or cause a change in species diversity locally or regionally.

e) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Less than Significant with Mitigation Incorporated. The City does not have an adopted tree protection ordinance.

As previously discussed, the project site contains riparian and wetland features. General Plan Policy 9.F (Wildlife Habitat Protection), indicates that those areas rich in wildlife species and fragile in ecological make-up, require the City to implement habitat protection measures. Per Implementation Measure 9.F.1, impacts to important wildlife habitat areas shall be identified as part of the City's development review and environmental review processes, and appropriate mitigations shall be considered. Mitigation measures to be considered include: designation of sensitive areas as open space, restriction of new development on lands that provide important wildlife habitat, setback requirements, habitat conservation plans, and habitat mitigation banking. Lands within the urban limit line that provide important wildlife habitat include riparian corridors.

In accordance with the definition for a riparian corridor set forth in WMC Section 7-6.152, an appropriate setback from development to the bankfull flowline of a perennial stream is 50 feet. As shown on the proposed site plan, no buildings are proposed within this area.

A proposed retaining wall to provide a landscaped open space area with artificial turf for informal open play next to the community building (Building #8) encroaches into this buffer area by up to 16 feet. The City also requested that the applicant move the proposed retaining wall next to the parking lot for residential building #6 towards the stream and into the buffer area to allow the Public Works & Utilities Department to be able to install a future trail link on a flat terrain along

the Upper Watsonville Slough, in accordance with the alignment shown for Segment 9.4 in the City's Trails and Bicycle Master Plan (2012). These activities represent passive activities allowed by the City for the enjoyment of riparian corridors and are not inconsistent with local City policies. In addition, implementation of Mitigation Measures BIO-1 through BIO-5 would ensure that special-status wildlife and vegetation, natural vegetation communities, and aquatic resources are protected in accordance with the City policies.

Regulatory framework, a description of on-site resources and mitigation measures follows.

Habitat-Level Regulatory Framework:

Special-Status Species Habitat

Special-status species are plant and animals which are listed or candidate species under the Federal or State Endangered Species Acts and other species considered rare enough to warrant special consideration. Reported occurrences of special-status species are compiled by the California Natural Diversity Data Base (CNDDB) of the CDFW and are routinely updated as new information becomes available. Detailed surveys are typically necessary to confirm the presence or absence of special-status species.

Marshes and Wetlands

Wetlands are transitional areas between aquatic and terrestrial habitats and include marshes, vernal pools, seeps, springs, and portions of riparian corridors with wetland vegetation. Wetlands are recognized for their high fish and wildlife habitat values, occurrences of unique plant and animal species, and importance in water recharge and filtration. Wetlands meeting certain criteria are subject to regulations of the USACE, USFWS, or CDFW. Wetland areas are mapped as part of the National Wetlands Inventory Detailed delineations are typically necessary to confirm the presence and extent of any jurisdictional wetlands.

General Plan

Chapter 9 of the General Plan covers Environmental Resource Management and relates to the avoidance or mitigation of environmental effect to the project and to the designated Environmental Management area associated with the property. This Chapter includes the following Goals and Policies as pertinent to the proposed project and associated Environmental Management designation:

> **Goal 9.8 Wildlife Habitat** – Preserve and protect the remaining areas of wildlife habitat for their scenic and scientific value.
> **Policy 9.F Wildlife Habitat Protection** – The City shall designate for open space and environmental management those areas rich in wildlife species and fragile in ecological make-up. These habitat zones shall be made part of the greenbelt where appropriate.

Riparian Corridors

City of Watsonville Municipal Code Section 7-6.152 states:

Riparian corridor shall mean those areas which fall into one of the following three (3) categories:

a) An area extending fifty (50') feet, measured horizontally, from each side of a perennial stream. Distance shall be measured from the top of the existing bank full flowline;
b) An area extending thirty (30') feet, measured horizontally, from each side of an intermittent steam. Distance shall be measured from the top of the existing bank full flowline; or

c) An area extending thirty (30') feet from the high-water mark of a marsh or natural body of standing water.

The City of Watsonville General Plan Environmental Resource Management Policies protect streamside conservation areas along designated riparian corridors. Areas along streams that naturally support native vegetation and wetlands are referred to as "Riparian Corridors." The abundant vegetation in the streamside environment provides food and water and creates breeding, egg deposition, and nesting areas for insects, fish, amphibians, reptiles, birds and mammals. The dense vegetation provides protective cover and shade and contributes woody debris to stream channels, providing critically important habitat for salmon, steelhead, freshwater shrimp, and other protected freshwater fisheries and aquatic species.

Riparian vegetation contributes to water quantity and quality in several ways. Vegetation filters sediment and pollutants in stormwater runoff, slows flood flows, provides erosion protection for streambanks, and facilitates groundwater recharge. Elimination of natural plant communities along streams can increase surface run-off and siltation, contribute to water temperatures too warm for steelhead, salmon, and other fish, and reduce long term water availability. The protection of riparian areas can create conflicts with agricultural and urban uses. Riparian corridors often contain prime soils for crops, provide water and shade for livestock, and provide a source of irrigation water and locations for agricultural wells. Riparian areas may support agricultural uses. In turn, vegetation removal, mowing, fencing, spraying, disking and other agricultural practices can reduce the habitat supporting functions of nearby riparian areas. In urban areas, streamside areas provide natural open space and opportunities for recreation, education, and aesthetic appreciation, but these areas and their habitat value are often restricted by buildings, yards, landscaping, fencing, and trails.

Riparian Corridors and Wetlands

The Riparian Corridor and Wetland objective (7-6.152) is established to protect biotic resource communities, including critical habitat areas within and along riparian corridors, for their habitat and environmental value, and to implement the provisions of the General Plan Environmental Resources Management Element. These provisions are intended to protect and enhance riparian corridors and functions along designated streams, balancing the need for urban development, and other land uses with the preservation of riparian vegetation, protection of water resources, floodplain management, wildlife habitat and movement, stream shade, fisheries, water quality, channel stability, groundwater recharge, opportunities for recreation, education and aesthetic appreciation and other riparian functions and values.

Removal of Trees and Other Vegetation

Construction grading and drainage shall not remove or disturb trees and other vegetation except in compliance with the City's best management practices for construction grading and drainage and the approved plans and specifications. Construction grading and drainage shall be conducted in compliance with the following requirements.

a) The limits of work-related ground disturbance shall be clearly identified and delineated on the approved plans and specifications and defined and marked on the site to prevent damage to surrounding trees and other vegetation.
b) Trees and other vegetation within the limits of work-related ground disturbance that are to be retained shall be identified and protected from damage by marking, fencing, or other measures.

Setbacks for Wetlands

Construction grading shall be set back 30 feet from the delineated boundary from wetlands designated in the zoning code and 50 feet from all other wetlands, unless a greater setback is required by the general plan or zoning code. The setback requirements would not apply where all necessary state and federal permits, approvals, or authorizations to fill the wetlands are obtained.

Mitigation: Implement **Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5**

Mitigation Monitoring: Implement **Mitigation Monitoring BIO-1.**

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

No Impact The project site is not located within the plan area of an adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state Habitat Conservation Plan.

References:

California Department of Fish and Wildlife (CDFW), 2019. Special Animals List: August 2019. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline (accessed on October 9, 2019).

City of Watsonville, 2005. General Plan. Available at: https://www.cityofwatsonville.org/160/2005-General-Plan (accessed on October 6, 2019).

City of Watsonville, 2012. Trails and Bicycle Master Plan. Available at: https://www.cityofwatsonville.org/DocumentCenter/View/3207/Trails--Bicycle-Master-Plan-PDF?bidId= (accessed on October 21, 2019).

ECI. 201 Kimberley Lane, 161, 141, & 139 Miles Lane Biological Report. Revised June 2019.

ECI. Preliminary Jurisdictional Delineation Report, 201 Kimberley Lane, 161, 141, & 139 Miles Lane. August 2019.

United States Fish and Wildlife Service (USFWS), 2019. National Wetlands Inventory. Available at: https://www.fws.gov/wetlands/data/Mapper.html (accessed on August 2, 2019).

6.5 Cultural Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?				✓
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Conclusion: Regarding cultural resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a) No Impact. The cultural resources records search results from the California Historical Resources Information System (CHRIS) Northwest Information Center (NWIC) indicate there are 19 historic buildings/structures (P-44-000408 through P-44-000970) located within a one half-mile radius of the project site. The 19 historic buildings/structures identified by the NWIC will not be impacted by the proposed project, as these historic resources are located outside of the project's boundary. The project site does not contain historic buildings or structures identified within the Historic District; therefore, there are no impacts to historic resources or built environments as a result of the proposed project.

Archival research indicate that the residential homes located at 141, 145, 149, 153, and 155 Miles Lane built in 1924 (95 years old) and the two homes located at 161 (A and B) Kimberly Lane built in 1947 (72 years old) would be directly impacted (demolished) by the proposed project (APNs: 016-491-01, -02, and -03; APN: 016-111-44).

Since these historic homes are 45 years old or older, they require an evaluation as historic sites to determine if these structures are eligible for listing in the National Register for Historic Places (NRHP), the California Register for Historic Resources (CRHR), or Local Register because the State Office of Historic Preservation (OHP), as a general guideline, has recommended that properties 45 years or older may be of historical or cultural value (though the National Register typically will not consider a property for listing that is less than 50 years old unless of exceptional importance).

A historic site evaluations on the residential homes located at 141, 145, 149, 153, and 155 Miles Lane (built in 1924) and the two homes located at 161 (A and B) Kimberly Lane (built in 1947) concluded that they are simple utilitarian structures lacking individual distinction and significance and they are not eligible for listing in either the NRHP or in the CRHR under any of the significance criteria.

In summary, there are no historic buildings/structures located within the Historic District that will be impacted by the proposed project. The 19 historic buildings/structures (P-44-000408 through P-44-000970) will not be impacted by construction operations, as these structures are all located outside of the project's boundary. As such, there would be no impact.

b) Less than Significant with Mitigation Incorporated. The cultural resources records search results conducted by the NWIC indicate that there are no archaeological resources (prehistoric and historic) located within the project's boundaries. The nearest archaeological site (P19-000396: shell midden) is located within a one half-mile radius of the project site. The archaeological (prehistoric) resource will not be impacted by the project, as the resource is located outside of the project boundary. Additionally, a Sacred Lands File Search through the Native American Heritage Commission (NAHC), Native American Scoping, and an archaeological pedestrian field survey, all failed to indicate archaeological (prehistoric and historic) resources within the project site. Therefore, the proposed project would result in no substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines section 15064.5.

The nearest archaeological site (P19-000396: shell midden) is located within a one half-mile radius of the proposed project and will not be impacted, as it lies outside of the project boundary. Nevertheless, despite the heavy disturbances to portions of the project site, it is possible to encounter buried archaeological resources given the proven prehistoric occupation of Santa Cruz County and the favorable natural conditions (e.g., ephemeral drainages, natural spring, and vegetation communities) that would have attracted prehistoric inhabitants to the area. As a result, in the event of the unanticipated discovery of archaeological or cultural resources relating to Tribal Cultural Resources (TCRs) during earthmoving operations, the following mitigation measures are required to be implemented to reduce potentially significant impacts to a less than significant level.

Mitigation Measure CUL-1: Conduct Archaeological Sensitivity Training for Construction Personnel. The Applicant shall retain a qualified professional archaeologist who meets U.S. Secretary of the Interior's Professional Qualifications and Standards to conduct an archaeological sensitivity training for construction personnel prior to commencement of excavation activities. The training session shall be carried out by a cultural resource professional with expertise in archaeology, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. The Applicant and/or qualified professional archaeologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The Applicant shall notify the City at least 48 hours before holding the training and keep a log of all attendees. The training session shall include a handout and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of archaeological monitors, and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation, if one is necessary.

Mitigation Measure CUL-2: Cease Ground-Disturbing Activities and Implement Treatment Plan if Archaeological Resources Are Encountered. In the event that archaeological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities will not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Monitored work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications

and Standards. In the event that the newly discovered artifacts are determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated. The Applicant and City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis.

Mitigation Measure CUL-3: Conduct Archeological Resource Spot Check during Grading and Earth- moving Activities in Younger Alluvial Sediments. The Applicant shall retain an archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards (qualified archaeologist) to conduct an archaeological spot check after excavation has reached two feet below ground surface. The check shall determine if excavations have exposed archaeological resources, or if there is significant potential remaining for discovery. Additional spot checks may be required at the discretion of the monitoring archaeologist. If archaeological resources are discovered during a spot check, a qualified archaeological monitor shall be required to monitor all subsequent ground moving activity. Multiple earth-moving construction activities may require multiple archaeological monitors, as deemed appropriate by the qualified archaeologist.

Mitigation Measure CUL-4: Prepare Report Upon Completion of Monitoring Services. The archaeological monitor, under the direction of a qualified professional archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards, shall prepare a final report at the conclusion of archaeological monitoring (if required). The report shall be submitted to the Applicant, the NWIC, the City, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. The report shall include a description of resources unearthed, if any, evaluation of the resources with respect to the California Register and CEQA.

c. Less than Significant with Mitigation Incorporated. No burial sites are known in the vicinity of the project site. The site would be disturbed by grading and construction activities, but it is not likely to be a burial site. The following mitigation measure is recommended to reduce potentially significant impacts to human remains/burials that are accidentally discovered during implementation of the proposed project to a less than significant level.

Mitigation Measure CUL-5: Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during implementation of the proposed project, the County of Santa Cruz and the Applicant shall comply with State Health and Safety Code Section 6050.5. The County of Santa Cruz and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of the reburial with the NAHC and the project archaeologist shall file a record of the reburial with the CHRIS-NWIC. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails

to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

References:

County of Santa Cruz, 2019. Assessor's Office: Search. Available at: https://sccounty01.co.santa-cruz.ca.us/ASR/ (accessed on July 15, 2019).

MIG, Inc., 2019. Native American Scoping Letters sent to the six tribes as recommended by the NAHC's, Prepared by Chris Purtell. MIG, Inc., Riverside Office.

Native American Heritage Commission, 2019. Scared Lands File Search Prepared in Support of the Miles Affordable Housing Project, Prepared by the Native American Heritage Commission via Ms. G. Totton, Addressed to Chris Purtell of MIG, Inc. Sacramento, California 95691.

Northwest Information Center, 2019. Cultural Resources Records Search in Support of the Miles Lane Affordable Housing Project (No. File No. 18-2323), Prepared by the Northwest Information Center, Addressed to Chris Purtell of MIG, Inc. Sonoma, California.

6.6 Energy Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

Conclusion: Regarding energy resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant. The proposed project consists of redeveloping the residential substance abuse facility and constructing a new outpatient rehabilitation facility and 61-unit affordable housing development. The existing residential substance abuse treatment facility and five homes that are on the project site are estimated to consume approximately 128,489 kilowatt hours (kWh) of electricity and 349,023 thousand British Thermal Units (kBTU) on an annual basis (see Appendix A). These consumption estimates are based on the CalEEMod modeling that was conducted to estimate criteria air pollutant and GHG emissions used in the air quality and greenhouse gas analyses, Sections 6.3 and 6.8, respectively.

Construction activities associated with the proposed project would require the use of heavy-duty, off-road equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Heavy-duty construction equipment would be required to comply with CARB's airborne toxic control measures, which restrict heavy-duty diesel vehicle idling to five minutes. Since petroleum use during construction would be temporary and needed to conduct development activities, it would not be wasteful or inefficient. Due to energy efficiency standards being improved over time, the new structures erected at the project site would be far more efficient than the existing structures at the site. The improvements to energy efficiency are in large part related to updates to the California Green Building Standards Code (2017). As estimated in CalEEMod, the proposed project is estimated to consume approximately 378,643 kWh of electricity and 736,247 kBTU on an annual basis—approximately 250,154 kWh and 387,224 kBTU more than existing conditions because of the additional dwelling units. Although more electricity and natural gas would be consumed on an annual basis compared to existing conditions, the structures would use the energy in a more efficient manner and would serve a much larger subset of the population in Watsonville. As such, the proposed project's energy consumption would not be wasteful, inefficient, or unnecessary. This impact would be less than significant.

b. Less than Significant. The proposed project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed under response a), the proposed residential substance abuse facility, outpatient

rehabilitation facility, and 61-unit affordable housing development would be constructed to the latest CALGreen Code, which would make them more energy efficient than the existing structures at the project site. Furthermore, the proposed project would not conflict with the City's Climate Action Plan, since many of the actions in the CAP consist of items the City will pursue (see Section 6.8, Greenhouse Gas Emissions). This impact would be less than significant.

References:

California Green Building Standards Commission (CalGreen), 2017. Section 4.201. Available at: https://www.ladbs.org/docs/default-source/publications/code-amendments/2016-calgreen_complete.pdf?sfvrsn=6 (accessed July 18, 2019).

6.7 Geology and Soils

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
ii) Strong seismic ground shaking?		✓		
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?			✓	
b) Result in substantial soil erosion or the loss of topsoil?		✓		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?		✓		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		✓		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Conclusion: Regarding geology and soils, the proposed project would not result in any significant environmental impacts.

Documentation:

ai. No Impact. The proposed project site is not located in an Alquist-Priolo fault zone (SFB Engineering). Therefore, the proposed project would not have an impact.

aii. Less than Significant Impact with Mitigation Incorporated. Much of the region is subject to seismic shaking that would result from earthquakes along the San Andreas Fault Zone System. Predicting seismic events is not possible, nor is providing mitigation that can entirely reduce the potential for injury and damage that could occur during a seismic event. However, by applying

geotechnical evaluation techniques and appropriate engineering practices, potential injury and damage from seismic activity can be diminished, thereby exposing fewer people and less property to the effects of a major damaging earthquake. The design and construction of new structures are subject to engineering standards of the California Building Code (CBC), which consider soil properties, seismic shaking and foundation type. Standard conditions of approval require that building permits be obtained for all construction and that the project meet all standard seismic and soil test/compaction requirements. Therefore, the potential impact from strong seismic ground shaking would be less than significant.

Mitigation Measure GEO-1: California Building Code. All construction activities shall meet the California Building Code regulations for seismic safety. Construction plans shall be subject to review and approval of the City prior to the issuance of a building permit. All work shall be subject to inspection by the City and must conform to all applicable code requirements and approved improvement plans prior to final inspection approval or the issuance of a certificate of occupancy. The Applicant shall be responsible for notifying construction contractors about California Building Code regulations for seismic safety.

aiii. Less than Significant. Strong ground shaking can result in liquefaction, the sudden loss of shear strength in saturated sandy material, resulting in ground failure and displacement. The proposed project site is located in a region that has not been mapped for liquefaction occurrence or potential (Appendices D and E). The U.S. Geological Survey identifies the site composed of an underlying layer of Pleistocene sediments, with low liquefaction potential (Dupre 1975), especially in the lower portion of the site. The potential for liquefaction and ground failure would be less than significant.

aiv. Less than Significant with Mitigation Incorporated. The urban and developed areas of Watsonville are primarily characterized by gradual to moderate slopes. In areas underlain by weak or unconsolidated earth materials, landslides are a hazard. The project is located in an area with moderate slopes; there is an approximately 62-foot decline from the west corner of the site to the low point and then a 42-foot incline from the low point back up to the east corner of the site. According to the Landslide Hazard Mapping for Selected California Highway Corridors, the proposed project site is not located in an area susceptible to landslides (Wills 2019). The impact would be less than significant.

b. Less than Significant with Mitigation Incorporated. The project includes grading, cuts, and fills, which require the issuance of a grading permit. Improper grading, both during and post-construction, has the potential to increase the volume of runoff from a site. Increased runoff could have adverse downstream flooding and further erosional impacts. Increased soil erosion on- and off-site which could adversely impact downstream water quality.

The potential soil erosion impact of the project would be less than significant with incorporation of **Mitigation Measures GEO-2** and **GEO-3**.

Mitigation Measure GEO-2: Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan. The Applicant shall submit an Erosion and Sediment Control Plan or Stormwater Pollution Prevention Plan prepared by a registered professional engineer or qualified stormwater pollution prevention plan developer as an integral part of the grading plan. The Plan shall be subject to review and approval of the City prior to the issuance of a grading permit. The Plan shall include all erosion control measures to be used during construction, including run-on control, sediment

control, and pollution control measures for the entire site to prevent discharge of sediment and contaminants into the drainage system. The Plan shall include the following measures as applicable:

a) Throughout the construction process, ground disturbance shall be minimized, and existing vegetation shall be retained to the extent possible to reduce soil erosion. All construction and grading activities, including short-term needs (equipment staging areas, storage areas and field office locations) shall minimize the amount of land area disturbed. Whenever possible, existing disturbed areas shall be used for such purposes.
b) All drainage ways, wetland areas and creek channels shall be protected from silt and sediment in storm runoff using appropriate BMPs such as silt fences, diversion berms and check dams. Fill slopes shall be stabilized and covered when appropriate. All exposed surface areas shall be mulched and reseeded. All cut and fill slopes shall be protected with hay mulch and/or erosion control blankets, as appropriate.
c) All erosion control measures shall be installed according to the approved plans prior to the onset of the rainy season but no later than October 15th. Erosion control measures shall remain in place until the end of the rainy season but may not be removed before April 15th. The applicant shall be responsible for notifying construction contractors about erosion control requirement.
d) Example design standards for erosion and sediment control include, but are not limited to, the following: avoiding disturbance in especially erodible areas; minimizing disturbance on slopes exceeding 30 percent; using berms, swales, ditches, vegetative filter strips, and catchbasins to prevent the escape of sediment from the site; conducting development in increments; and planting bare soils to restore vegetative cover.
e) The applicant will also develop an inspection program to evaluate if there is any significant on-site erosion as a result of the rainfall. If there were problem areas at the site, recommendations will be made to improve methods to manage on-site erosion.

c. Less than Significant with Mitigation Incorporated. The project site is subject to seismic shaking and other geologic hazards. A discussion of the impacts related to landslides and liquefaction described in Section 6.7 (aii, aiv).

Lateral spreading occurs when soils liquefy during an earthquake event and the liquefied soils along with the overlying soils move laterally to unconfined spaces causing horizontal ground displacements. Two of the soil boring's taken on site revealed soils with high compositions of sand and clay near the eastern property boundary. In the low probability event that on-site soil is saturated at the time of a fault rupture, the isolated layer of sand has a high potential of liquefying which could potentially result in significant lateral spreading.

The project site is moderately sloped and could be subject to slope instability near the eastern boundary of 141 Miles Lane (APN 016-491-02). The project would not utilize a well thus reducing the probability of on-site subsidence. Incorporation of the following Mitigation Measures in addition to compliance with CBC and OSHA regulations would reduce impacts to less than significant.

Implement **Mitigation Measures GEO-1 and GEO-2.**

d. Less than Significant with Mitigation Incorporated. The proposed project is located on soils mapped as Watsonville loam (2 to 15 percent slopes) and Tierra-Watsonville Complex (15 to 30 percent slopes) according to the Soil Report prepared for the project (Appendix D). Both soil types are categorized as Hydrologic Soil Group D by the USDA Natural Resource Conservation Service

(NRCS). Group D soils typically have slow infiltration rates, moderate to high shrink-swell potential and are considered expansive soils. Type D soils generally consist of clay or shallow soils located on impermeable surfaces such as bedrock.

Project construction and grading activities must be conducted in compliance with the California Building Code and City Code Chapter 13-7 (Construction Grading and Drainage Ordinance). Compliance will all applicable construction and grading regulations and the implementation of Mitigation Measure and Monitoring GEO-1and GEO-2 would reduce impacts to life and property created from soil expansion to less than significant levels.

Implement **Mitigation Measures GEO-1 and GEO-2.**

e. No Impact. The proposed project is within the City boundaries and would be served by a public sewer system and therefore does not include the installation of septic tanks or alternate wastewater disposal systems.

f. Less than Significant Impact with Mitigation Incorporated. Results of the on-line paleontological resources record search through the University of California Museum of Paleontology (UCMP) database indicate that there are no known vertebrate fossil localities that have been previously identified within the project area or within a mile radius. The UCMP database also failed to identify fossil localities that were discovered within the same sedimentary deposits at depths that extend into the project site.

An examination of the Geological Map of California indicates that the project area consists of surface sediments composed of Younger Quaternary alluvial fan deposits that are underlain by Quaternary Non-marine Terrance deposits. These Younger Quaternary deposits typically do not contain significant vertebrate fossils at shallow depths. Nevertheless, the project area is underlain by undisturbed Quaternary Non-marine Terrance deposits. These Quaternary (Non-marine Terrance) deposits have the potential of uncovering significant vertebrate fossils, even at depths as shallow as five feet below the surface. Excavations that extend below 5-feet may well uncover significant vertebrate fossil remains and, therefore, should be closely monitored to quickly and professionally collect any vertebrate fossil remains without impeding development. As a result, the implementation of the following best practice and two recommended mitigation measures are provided to reduce potentially significant impacts to a less than significant level regarding previously undiscovered paleontological resources or unique geological features that may be accidentally encountered during project implementation to less than a significant level.

Implementation of the following best practice will help ensure less than significant impact. If paleontological resources are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the Applicant and the City. Work shall be allowed to continue outside of the buffer area. The Applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading

and excavation contractor shall assist in removing rock samples for initial processing. Paleontological monitoring may be required and will be outlined in the treatment plan.

Mitigation Measure GEO-3: Conduct Paleontological Sensitivity Training for Construction Personnel. The Applicant shall retain a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology and shall conduct a paleontological sensitivity training for construction personnel prior to commencement of excavation activities. The Applicant and/or qualified professional paleontologist shall propose a date for scheduling the training at the pre-construction meeting with City staff. The Applicant shall notify the City at least 48 hours before holding the training and keep a log of all attendees. The training will include a handout and will focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event, the duties of paleontological monitors, notification and other procedures to follow upon discovery of resources, and the general steps a qualified professional paleontologist would follow in conducting a salvage investigation if one is necessary.

Mitigation Measure GEO-4: Cease Ground-Disturbing Activities and Implement Treatment Plan if Paleontological Resources Are Encountered. If paleontological resources and or unique geological features are unearthed during ground-disturbing activities, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where construction activities shall not be allowed to continue until appropriate paleontological treatment plan has been approved by the Applicant and the City. Work shall be allowed to continue outside of the buffer area. The Applicant and City shall coordinate with a professional paleontologist, who meets the qualifications set forth by the Society of Vertebrate Paleontology, to develop an appropriate treatment plan for the resources. Treatment may include implementation of paleontological salvage excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. At the paleontologist's discretion and to reduce construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

References:

California Department of Conservation, 2010. Geologic Map of California. Available at: http://maps.conservation.ca.gov/cgs/gmc/ (accessed October 6, 2019).

Dupre, W., 1975. Maps Showing Geology and Liquefaction Potential of Quaternary Deposits in Santa Cruz County, California, USGS Misc. Field Studies Map MF-648.

University of California, Berkeley, Museum of Paleontology, 2019. On-line Paleontological Database Search in Support of the Miles Lane Affordable Housing Project, Watsonville. Available at: https://ucmp.berkeley.edu/ (accessed October 6, 2019).

Wills et al, 2019. Landslide Hazard Mapping for Selected California Highway Corridors Phase 2-Special Report 243, California Geological Survey Department of Conservation Sacramento, California.

6.8 Greenhouse Gas Emissions

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Conclusion: Regarding greenhouse gas emissions, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant. Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). The six most common GHGs are listed below.

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Sulfur hexafluoride (SF_6)
- Hydrofluorocarbon (HFCs)
- Perfluorocarbons (PFCs)

GHGs that contribute to climate change are a different type of pollutant than criteria or hazardous air pollutants, as previously discussed in Section 6.3, Air Quality, because climate change is global in scale, both in terms of causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, which affects climate regulation and results a changing climate globally. Examples of the effects of global climate change include rising temperatures, increased severe weather events such as drought and flooding.

GHGs can remain in the atmosphere long after they are emitted. The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO_2, which has a GWP of one. By comparison, CH_4 has a GWP of 25, which means that one molecule of CH_4 has 25 times the effect on global warming as one molecule of CO_2. Multiplying the estimated emissions for non-CO_2 GHGs by their GWP determines their carbon dioxide equivalent (CO_2e), which enables a project's combined global warming potential to be expressed in terms of mass CO_2 emissions. Most often, GHG emissions associated with projects are referred to in terms of metric tons of CO_2e, or $MTCO_2e$.

In 1997, the United Nations' Kyoto Protocol was adopted in Kyoto, Japan, establishing an international treaty that set targets for reductions in emissions of four specific GHGs – CO_2, CH_4, N_2O, and SF_6 – and two groups of gases – HFCs and PFCs. As previously mentioned, these GHGs are the primary GHGs emitted into the atmosphere by human activities. The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change.

The State of California has numerous regulations aimed at reducing GHG emissions. In 2005, for instance, the governor issued Executive Order S-3-05, establishing statewide GHG emissions reduction targets. Executive Order S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent below 1990 levels (CalEPAw 2006). In 2006, the California Global Warming Solutions Act (AB 32) was signed into law. AB 32 codifies the statewide GHG emission reduction targets and required CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline, which was approved in 2008 and updated in 2014. On September 8, 2016, Governor Brown signed SB 32 into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 is an extension of AB 32, and the other provisions of AB 32 remain unchanged. In 2017, CARB is prepared an update to the Scoping Plan to provide a framework for achieving the 2030 target (CARB 2017).

The Monterey Bay Air Resources District (MBARD), as the regional air agency for the Basin, has air-permitting authority in Santa Cruz County. As of August 2019, MBARD has not adopted recommended GHG significance thresholds applicable to development projects, and instead recommends the use of GHG thresholds adopted by other air districts in California, such as the Sacramento Metropolitan Air Quality Management District (SMAQMD) and the Bay Area Air Quality Management District (BAAQMD). Both the SMAQMD and BAAQMD have adopted GHG mass-emission thresholds of 1,100 $MTCO_2e$ for new development projects. These adopted thresholds, however, were developed by the SMAQMD and BAAQMD to meet State-GHG emissions reductions for 2020 established under AB 32 (i.e., to reduce GHG emissions to 1990 levels by 2020). Since the proposed project is scheduled to become operational in late 2021, the 1,100 $MTCO_2e$ threshold does not directly address the next GHG reduction target identified under SB 32 (i.e., to reduce GHG emissions 40 percent below 1990 levels by 2030). At the time of this writing, no air district within the State has released updated thresholds, including SMAQMD and BAAQMD, or provided guidance to lead agencies for how to address post-2020 emissions.

Therefore, to evaluate the significance of the proposed project's GHG emissions, this analysis compares the proposed project's estimated emissions against a 1,100 $MTCO_2e$ SMAQMD and BAAQMD threshold, as well as a project specific GHG reduction target of 660 $MTCO_2e/yr$[2] to meet the State's 2030 reduction goal required under SB 32. This allows the City to demonstrate compliance with currently adopted thresholds by the SMAQMD and BAAQMD, as well as future GHG reduction goals.

The proposed project would generate GHG emissions from both short-term construction and long-term operational activities. Construction activities would generate GHG emissions primarily from

[*] The 660 MTCO2e/yr goal was developed by taking the 1,100 MTCO2e/yr threshold, which was the threshold to reduce emissions back to 1990 level and reducing it by 40 percent (1,100 MTCO2e/yr * (1 - 0.4) = 660 MTCO2e/yr). This demonstrates the progress required under SB 32. This linear reduction approach oversimplifies the threshold development process. The County is not adopting nor proposing to use 660 MTCO2e as a CEQA GHG threshold for general use; rather, it is only intended for use on this Project.

equipment fuel combustion as well as worker, vendor, and haul trips to and from the project site during demolition, site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHGs upon completion, unlike operational emissions that continue year after year until the commercial buildings constructed as part of building of the project close or cease operation. Since neither the SMAQMD nor BAAQMD have an adopted construction GHG-emission threshold, construction related-GHG emissions are amortized over the lifetime of the proposed project (presumed to be a minimum of 30 years). This normalizes construction emissions so they can be grouped with operational emissions and compared to appropriate thresholds, plans, etc. GHG emissions from construction the proposed project were estimated using CalEEMod, version 2016.3.2, based on the anticipated construction schedule, activities, and equipment, described in Section 6.3, Air Quality. The proposed project's total construction emissions, as estimated in CalEEMod, are shown in Table 5.

Table 5. Project Construction Greenhouse Gas Emissions

Construction Year	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL(A)
2020	256.7	0.01	0.0	258.3
2021	249.0	<0.0(B)	0.0	250.3
Total	505.7	<0.0(B)	0.0	508.6
Amortized (C)	*16.9*	<0.0(B)	*0.0*	*17.0*

Source: MIG 2019 (see Appendix A)
Note:
(A) $MTCO_2e$
(B) <0.0 does not mean emissions are zero; rather, it means emissions are greater than zero, but less than 0.005.
(C) Amortized over 30-years. Slight variations may occur due to rounding.

Once operational, the proposed project would generate GHG emissions from area, mobile, water/wastewater, and solid waste sources. Although CaEEMod default assumptions were generally used for the operational emission modeling, the CalEEMod project file was updated to reflect the project would comply with the 2019 Title 24 Building Code, which is more efficient than the 2016 Title 24 Building Code, the building code efficiency standards accounted for in CalEEMod. The proposed project's operational GHG emissions, combined with the amortized construction emissions are shown in Table 6, the proposed project's potential net increase in GHG emissions would be below the BAAQMD and SMAQMD's established 2020 GHG emissions threshold, as well as the 2030 derived GHG emission goal. Therefore, this impact would be less than significant.

Table 6. Project Operational Greenhouse Gas Emissions Over 30 Years

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL[A]
Area	1.3	<0.0[B]	0.0	1.3
Energy	149.4	<0.0[B]	<0.0[B]	150.1
Mobile	530.9	<0.0[B]	0.0	531.5
Solid Waste	17.2	1.0	0.0	42.6
Water/Wastewater	13.9	0.2	<0.0[B]	19.7
Amortized Construction	*16.9*	<0.0[B]	*0.0*	*17.0*
Total Project Emissions[C]	*729.6*	1.2	<0.0[B]	*745.3*
Existing Project Site Emissions	*160.9*	0.4	<0.0[B]	*171.0*
Net Emission Increase	***568.7***	***0.8***	***<0.0[B]***	***574.3***
BAAQMD/SMAQMD 2020 Threshold	--	--	--	1,100
Derived 2030 Emission Goal	--	--	--	660
Exceeds Goals?	--	--	--	No

Source: MIG 2019 (see Appendix A)
Note:
(A) $MTCO_2e$
(B) <0.0 does not mean emissions are zero; rather, it means emissions are greater than zero, but less than 0.005.
(C) Slight variations may occur due to rounding.

b. Less than Significant. The proposed project would not conflict with CARB's Scoping Plan, AMBAG's 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy, or the City of Watsonville's Climate Action Plan. The project's consistency with these plans is described in more detail below.

CARB Scoping Plan

The 2017 Climate Change Scoping Plan is CARB's primary document used to ensure State GHG reduction goals are met. The plan identifies an increasing need for coordination among State, regional, and local governments to achieve the GHG emissions reductions that can be gained from local land use planning and decisions. The major elements of the 2017 Climate Change Scoping Plan, which is designed to achieve the State's 2030 GHG reduction goal include:

- Continued implementation of SB 375.
- Implementing and/or increase the standards of the Mobile Source Strategy, which include increasing zero emission vehicle (ZEV) buses and trucks.
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewable Portfolio Standard (RPS) to 50 percent and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing CH_4 and hydrocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Nearly all of the specific measures identified in the 2017 Climate Change Scoping Plan would be implemented at the state level, with CARB and/or another state or regional agency having the primary responsibility for achieving required GHG reductions. The proposed project, therefore, would not directly conflict with any of the specific measures identified in the 2017 Climate Change Scoping Plan.

2040 Metropolitan Transportation Plan/Sustainable Communities Strategy

AMBAG is the Metropolitan Planning Organization responsible for preparing the region's Sustainable Communities Strategy (SCS), in compliance with SB 375. The SCS is developed as part of regional transportation planning and is incorporated in the Metropolitan Transportation Plan prepared for the AMBAG region. The most recent plan adopted by AMBAG is the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (AMBAG, 2018). The 2040 MTP/SCS sets forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, is intended to reduce GHG emissions from passenger vehicles and light duty trucks to achieve the regional GHG reduction targets set by CARB.

CARB set targets for the AMBAG region as "not to exceed 2005 per capita levels of GHGs" by 2020 and a five percent reduction from 2005 levels by 2035 (CAP). These targets applied to the AMBAG region as a whole for all on-road light duty trucks and passenger vehicles emissions, and not to individual cities or sub-regions. Therefore, AMBAG, through the 2040 MTP/SCS, must maintain or reduce these levels to meet the 2020 target and reduce these levels to meet the 2035 targets.

As described under Section 6.14, Population and Housing, the proposed project is within the growth forecasts of the 2040 MTP/SCS. Therefore, the growth (and associated traffic) facilitated under implementation of the proposed project has been accounted for in the 2040 MTP/SCS's growth projections, and the project would be consistent with the 2040 MTP/SCS.

Watsonville Climate Action Plan

On April 9, 2015, the City of Watsonville released its final version of the City's Climate Action Plan (CAP). The CAP sets forth 13 actions to help reduce GHG emissions in 2020 and 2030. Many of the actions identified in the CAP consist of items the City will pursue, such as reducing or removing permit fees for solar PV and solar water heaters, or implementing formal bike lanes and infrastructure programs. The proposed project would not conflict with the City's implementation of these actions. In addition, as described under response a), the project's emissions would be consistent with the State's 2030 reduction goals. Therefore, the proposed project would not conflict with or obstruct the implementation of a plan, policy, or regulation adopted for the purposes of reducing greenhouse gas emissions. This impact would be less than significant.

References:

Association of Monterey Bay Area Governments (AMBAG), 2018. 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy.

Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines. Available at: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed October 6, 2019).

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. Available at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf (accessed October 6, 2019).

California Environmental Protection Agency (CalEPA). 2006. Climate Action Team Report to Governor Schwarzenegger and the Legislature. Available at: https://www.climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF (accessed October 6, 2019).

City of Watsonville, 2015. City of Watsonville Climate Action Plan (CAP).
Sacramento Metro Air Quality Management District (SMAQMD), 2018. CEQA Guidance & Tools. Chapter 6: Greenhouse Gases. Available at: http://www.airquality.org/LandUseTransportation/Documents/Ch6GHGFinal5-2018.pdf (accessed October 6, 2019).

6.9 Hazards and Hazardous Materials

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?			✓	
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			✓	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

Conclusion: Regarding hazards and hazardous materials resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. Construction of the proposed project, as well as ongoing maintenance over time, may involve the intermittent transport, use and disposal of potentially hazardous materials, including fuels and lubricants, paints, solvents, and other materials commonly used in construction and maintenance. To maintain the health and safety of the public and environment, during construction, any on-site hazardous materials that may be used, stored, or transported would be required to follow standard protocols as determined by the U.S. EPA, California Department of Health and Safety, and City of Watsonville.

The Watsonville General Plan has Goals which guide development in compliance with hazardous material management.

- Goal 12.1 Land Use Safety Plan for and regulate the uses of land in order to provide a pattern of urban development which will minimize exposure to hazards from either natural or human related causes.
- Goal 12.5 Hazardous Materials: Reduce the potential danger related to the use, storage, transport, and disposal of hazardous materials to an acceptable level of risk for city residents.
- Goal 12.A.5 Risk Reduction: The City shall identify avoid, and or minimize natural and human caused hazards in the development of property and the regulation of land use.
- Goal 12.7 Emergency Preparedness. Anticipate the potential for disasters, maintain continuity or life support functions during an emergency, and maximize efforts for post-emergency recovery.

Future residential and service uses associated with the development would also be expected. To manage potentially hazardous waste associated with these uses, free household hazardous waste disposal is available to Watsonville residents at the City's designated waste and recycle drop-off location (Watsonville Public Works).

Project construction may also involve short-term transport, storage, and use of hazardous materials. Future project use of any hazardous substances that may be generated, stored, transported, used, or disposed would be subject to applicable federal, State, and local regulations. Given the existing General Plan goals (shown above) and federal, State, and local regulation and oversight of hazardous materials the potential threat to public health and safety or the environment from hazardous transport, use or disposal would represent a less-than-significant impact.

b. Less than Significant Impact with Mitigation Incorporated. Construction of the proposed project would require the use and possible release of hazardous materials, such as paints and other solvents. However, the project would be required to comply with construction practices and mitigation measures to prevent, contain and/or clean-up potential spills and contamination form fuels, solvents, concrete wastes, and other potentially hazardous materials, such as asbestos-containing materials and lead-based paint. Because the use and transport of hazardous materials would be required to follow Federal, State, and local regulations, the risk of releasing hazardous materials form accidents would be less than significant.

Asbestos-containing Materials

Two Environmental Site Assessments (ESA) were performed for the project covering the four subject parcels (Appendices F and G). A Phase I ESA was prepared for the project site by Remediation Risk Management, Inc (Appendix F). According to this Phase I ESA, the project site is developed with seven houses. Per the assessment, two houses (141 Miles Lane) were constructed between 1917 and 1937 and the remainder of the houses (161 Miles Lane) were built after the conclusion of World War II in the late 1940s/early 1950s. Because of the age of these structures, asbestos-containing materials (ACM) could have been used in their construction; ACMs were commonly used in building construction until the 1980s. Asbestos generally does not pose a threat when it remains intact. However, when asbestos is disturbed and becomes airborne, such as during demolition activities, significant impacts to human health could occur. Construction workers completing demolition activities, as well as surrounding uses, have the potential to be exposed to airborne asbestos emissions due to the potential presence of ACM. The second ESA conducted by AEI Consultants did not mention the potential presence of ACM on the portion of the project site at 139 Miles Lane (APN 016-491-03), which is presently undeveloped, and therefore did not recommend further action (Appendix G).

Mitigation Measure HAZ-1: Asbestos Containing Materials. Per recommendations in the Phase I ESA performed for the project site, prior to any redevelopment or demolition activities the Applicant shall: (1) survey the existing on-site structures for the presence of asbestos containing materials (to be conducted by an OSHA-certified inspector); and (2) if building elements containing any amount of asbestos are present, prepare a written Asbestos Abatement Plan describing activities and procedures for removal, handling, and disposal of these building elements using EPA- and/or OSHA-approved procedures, work practices, and engineering controls.

Lead-based Paints

The Phase I ESA also determined that, due to the age of the existing buildings, the lead-based paints (LBPs) could have been used as construction materials for those structures. Sampling for LBP was not included in the scope of work for the Phase I ESA. Similar to asbestos, exposure of construction workers to LBP during demolition activities could be of concern.

Mitigation Measure HAZ-2: Lead-based Paints. The Applicant shall test the existing on-site structures for lead-based paint. If present, the lead-based paint shall be removed and disposed of following lead abatement performance standards included in the U.S. Department of Housing and Urban Development Guidelines for Evaluation and Control of Lead-Based Paint program, in compliance with Title 8 California Code of Regulations (including Section 1532.1).

c. Less than Significant Impact. The closest existing schools are Cesar E. Chavez Middle School (approximately 0.17 miles west of the project site), Hyde Elementary School (approximately 0.25 miles north of the project site), Mintie White Elementary School (approximately 0.39 miles to the southeast of the project site), and Moreland Notre Dame School (approximately 0.44 miles to the south of the project site). As discussed in the above Section 6.9-a, construction and operation of the project would not generate hazardous emissions, nor result in the storage, handling, production, or disposal of acutely hazardous materials. Therefore, the project impacts to schools associated with production or emission of hazardous emissions, materials, or substances would be less than significant.

d. Less than Significant Impact. The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 65962.5 (Cortese List). The Phase I ESA performed for this project reviewed Envirostar, GeoTracker, and other hazardous materials databases, and identified two hazardous material sites within 0.5 miles of the project site. One site, 1350 Freedom Boulevard, approximately 0.18 miles north of the project site is identified as contaminated. Per GeoTracker, the site supported a dry-cleaning facility since 1970 that used tetrachloroethene (PCE). Wastewater containing PCE from the dry-cleaning operation was discharged into an onsite sanitary sewer and a 1992 inspection showed poor conditions of that sewer line. According to GeoTracker the cleanup status is open, and the last assessment and remedial action occurred on April 5, 2012. Another site, 1455 Freedom Boulevard, approximately 0.44 miles northwest of the project site is also identified as contaminated. Per GeoTracker, the site (a former gas fueling station) contained underground storage tanks (USTs) containing gasoline. According to the Phase I ESA and GeoTracker, the site was issued "case closed" status on January 10, 2014. The State Water Resources Control board evaluates sites based on multiple closure criteria to determine if any further actions are warranted. While there are open and closed status Cortese List sites in the general area of the project, the project site is not located on a hazardous materials site pursuant to Government Code 65962.5 (Cortese List). Therefore, this impact would be less than significant.

e. Less than Significant Impact. Santa Cruz County has been identified as a "no procedures county" as there is only one public use airport—the Watsonville Municipal Airport—in the County. In accordance with Public Utilities Code (PUC) Section 21670.1(e), the preparation of an airport land use compatibility plan is not required; however, the City must submit its general and specific plans to Caltrans Division of Aeronautics for review.

The *California Airport Land Use Planning Handbook* (Caltrans 2011) provides guidance for airport land use compatibility planning, as required by PUC Section 21670-21679.5. The Handbook is intended to ensure compatible airport land uses by ensuring the safe and efficient operation of airports and the safety of people living or working near airports. The Handbook defines six Airport Safety Zones, ranging from Zone 1 (Runway Protection Zone) to Zone 6 (Traffic Pattern Zone), and outlines land use restrictions for each zone. For example, the Handbook indicates that all new structures and residential land uses are prohibited in Airport Safety Zone 1 because the risk level is "very high" due to the high parentage of near-runway accidents in this zone. At the other end of the spectrum, the Handbook does not recommend prohibiting any residential or nonresidential uses in Airport Safety Zone 6 yet recommends avoiding "outdoor stadiums and similar uses with very high intensities" (Caltrans 2011). The Handbook indicates that the risk level is "low" for Zone 6.

Watsonville Municipal Airport is approximately 1.4 miles northwest of the project site. The airport has an adopted Airport Master Plan that delineates the six Airport Safety Zones surrounding the airport (Watsonville Airport Plan 2003). The project site is located outside of the delineated Airport Safety Zones, including the furthest zone from the airport's runways—Zone 6, the Traffic Pattern Zone. Therefore, the project would not result in a safety hazard for people residing or working in the project area.

f. No Impact. The City of Watsonville does not have an adopted emergency response plan or emergency evacuation plan. The County of Santa Cruz, however, adopted an Operational Area Emergency Plan in 2015. The project would not impair implementation of, or physically interfere with the County's Emergency Plan. Current street configuration would not change. Therefore, the project would not create, interrupt, or otherwise reduce the ability of streets to convey traffic. Any need for construction-related traffic land reductions or partial street closures would be temporary, intermittent, localized, and subject to standard City traffic management practices. The project would not result in significant change in existing circulation patterns and would have no effect to emergency response routes.

g. No Impact. The project site is in an urbanized part of Watsonville with no wildland conditions. The project site is not located within a State-identified fire hazard zone as indicated on the latest Fire Hazard and Severity Zone maps prepared by the California Department of Forestry and Fire Protection (CalFire). According to Santa Cruz County's Local Hazard Mitigation Plan, the project site is outside of the Generalized Critical Fire Hazard Area, which is located approximately three miles to the east in unincorporated Santa Cruz County. For these reasons, it can be reasonably be determined that there are no risks associated with wildland fires.

References:

Cal Fire, 2007. Fire Hazard Severity Zones in SRA: Santa Cruz County. Available at: https://osfm.fire.ca.gov/media/6768/fhszs_map44.pdf (accessed July 19, 2019).

Caltrans, 2011. California Airport Land Use Planning Handbook. Available at: https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/airportlanduseplanninghandbook.pdf (accessed October 6, 2019).

City of Watsonville, 2003. Watsonville Municipal Airport Master Plan 2001-2020. Available at: https://www.cityofwatsonville.org/DocumentCenter/View/987/CM-Resolution-179-03-Airport-Master-Plan-PDF (accessed July 19, 2019).

City of Watsonville: Department of Public Works and Utilities, 2019. Household Hazardous Waste Disposal. Available at: https://www.cityofwatsonville.org/781/Household-Hazardous-Waste-Disposal (accessed July 19, 2019).

County of Santa Cruz, 2015. Local Hazard Mitigation Plan. Available at: http://www.co.santa-cruz.ca.us/Portals/0/Local%20Hazard%20Mitigation%20Plan%202015-2020.pdf (accessed July 19, 2019).

6.10 Hydrology and Water Quality

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:				
i. Result in a substantial erosion or siltation on- or off-site;			✓	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite:			✓	
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			✓	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓

Conclusion: Regarding hydrology and water quality, the proposed project would not result in any significant environmental impacts.

Documentation:
This hydrology analysis references the C3 Engineering Inc. Stormwater Control Plan (Appendix H). The analysis breaks down the project area into three sperate areas (sites) for stormwater evaluation. The Encompass site (fronting Santa Clara and Miles) includes the inpatient and outpatient facilities (buildings 9 & 10). The Marchisio site sits in between the Encompass site and the sensitive habitat and includes building 1-5 and 8. The Dinyari site lies to the east of the sensitive habitat and includes buildings 6 and 7.

a. Less than significant. Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result

in environmental damage or sickness in people. The proposed project would result in a significant impact to water quality if it violated water quality standards and waste discharge requirements or resulted in the degradation of water quality.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The proposed project, which consists of a development of 61 units of affordable dwelling units does not propose any uses that would generate point source pollutants. Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants include:

- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites
- Atmospheric deposition and hydromodification

Impacts associated with urban water pollution include sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management, or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading, and storage areas, or result in contaminated discharges directly into the storm drain system.

The City has an MS4 National Pollutant Discharge Elimination System (NPDES) permit and is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water sources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials. Project construction would be subject to City's NPDES permit requirements during construction activities in addition to standard NPDES operational requirements.

Violations of water quality standards due to urban runoff can be prevented through implementation of existing regional water quality regulations, including compliance with the 2015 Urban Water Management Plan, and the City's Sewer Services (Chapter 6-3.5 of the Municipal Code), which includes the post-construction requirements. Additionally, the project will include an erosion plan which will include measures to manage runoff. In the project design, the applicant has included a drainage system consisting of onsite collection basins and landscaped areas to collect and filter on-site stormwater and irrigation run-off. The impact would be less than significant.

b. Less than significant. The proposed project mimics the existing drainage pattern, discharging via the existing perennial creek bisection the property. In the proposed condition, siltation would be controlled by a proposed pre-treatment structure that captures sedimentation and debris prior to entering the proposed drywell systems, and ultimately discharging from the site. No construction would occur in the sensitive habitat area; there would be some minor improvement and landscaping within the 50-foot setback representing the riparian corridor for the exiting perennial stream. Pervious parking, bioswales, and other additional measures will be implemented to reduce impacts

to drainage patterns. These other measures are discussed in Section 4.10(ci-ciii). The impact would be less than significant.

ci. Less than Significant. The proposed project will result in a net increase of impervious area by 119,217 square feet. The City will require the project to implement BMPs to prevent significant erosion as listed in the stormwater control plan (Appendix H). The BMPs include various measures for erosion and sediment control, including preservation of existing vegetation, mulching, protection of downslope drainage and nonvegetative stabilization. Additionally, sediment traps will be laid around site drainages. Temporary BMPs include, adding straw bales, silt fences, sandbags, street sweeping, various sediment traps, and berms to prevent erosion and silting, dumpsters, storage areas, concrete washout areas, and portable toilets. The impact would be less than significant.

cii. Less than Significant. The project design incorporates several strategies to reduce runoff. At the Encompass parcel, there are no natural drainage features. However, clearing and grading of native vegetation will be limited to the immediate areas of development. Impervious surfaces are confined to the north and south of the parcel, and the site has been designed with large open space areas that will take runoff safely away from building foundations and footings, consistent with California building code. Bioswales are included in the development to satisfy LID requirements (Appendix H).

BMPs are in place to prevent surface runoff and flooding on- and offsite. The City will require the project's use of BMPs, as listed in the post-construction requirements. BMPs preventing flooding and runoff are protection of storm drains and down slope drainage courses, construction of planting temporary vegetation during periods of rain, and during winter operations, runoff will be detained or filtered by berms, vegetated filter trips and/or catch basins. With these BMPs in place, there will be no impact to onsite or offsite flooding.

There are 12 drainage management areas (DMAs) on the project site (Appendix H). At all sites, runoff from impervious surfaces will be routed to catch basins equipped with media filters. The filters have a capacity of 0.38 cfs and a bypass capacity of 5.14 cfs. The filters are capable of removing suspended solids as well as hydrocarbons and will have the capacity to treat flow of runoff produced by a rain event equal to at least two times the 85th percentile hourly rainfall intensity for the applicable area.

ciii. Less than significant. The proposed project would not create or contribute runoff water that would exceed capacity of existing or planned stormwater drainage systems. In order to satisfy water quality requirements, runoff from events up to the 95th percentile 24-hour rainfall event (1.3 inches) shall be retained on site. The project's total required stormwater capacity is 3,955 cfs; the project includes retention well in excess of the required amount as all of the DMAs have stormwater retention capacity in excess of what is required (Table 7).

Table 7. Stormwater Retention by Drainage Management Areas (DMAs)

Property	Drainage Management Area	Cubic feet per second (cfs)	
		Retention Required	Capacity
Encompass	1 &2	808	2,306
	3 & 4	331	1,116
Marchisio	5-9	2,077	4,573
	10	1,425	4,210
Dinyari	11	1,782	3,250
	12	1,276	3,250
Source: Appendix H			

Since the discharge generated from the developed condition of the site is less than the existing discharge for the site [Section 4.10(c.ii), Section 4.10(c.iii)], the existing storm drain system has adequate capacity for the proposed development. Drainage patterns would not be altered on or off site. The impact would be less than significant.

d. Less than significant. Any potential impacts related to the release of pollutants due to project inundation are less than significant. The project is not located in a tsunami zone, nor seiche zone. However, the project is located within a 100-year floodplain, as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps. The area in the middle of the parcel on either side of the Watsonville Slough is identified as Zone AE, defined by FEMA as the area that has a 1 percent chance of annual 100-year flood. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. As stated in Section 4.10(c.i), no construction will be occurring in Zone AE.

e. Less than significant. As a result of planned treatment features, impacts related to violation of water quality standards would be less than significant. A Storm Water Control Plan (Appendix H) was prepared by C3 Engineering Inc., in accordance to Watsonville Municipal Code Section 6-3.535 Post-construction requirements. While the project is in construction, temporary construction BMPs, as well as erosion control measures, would be put in place to reduce construction and post-construction siltation. For more information on BMPs, see questions in Section 6.10(ci-ciii). Both the existing and project site conditions are, or would be, fully developed, and no exposed soils would be present to provide for any erosion potential. For the above reasons, no impact would occur. The project does not conflict with a groundwater management plan.

The 2015 adoption of the State's Model Water Efficient Landscape Ordinance (MWELO) applies to projects requiring a planning-level permit that contains over 500 square feet of new or rehabilitated landscape areas. The new MWELO reduces the size of turf areas in residential projects and prohibits turf in commercial projects. It also requires the use of highly efficient irrigation methods and is predicted to reduce landscape water use in new projects by 30 percent or more.

Compliance with the existing stormwater management plans reduces the project's impacts to less than significant.

References:

City of Watsonville, 2016. Urban Water Management Plan. Available at: https://www.cityofwatsonville.org/DocumentCenter/View/2046/2015-Urban-Water-Management-Plan-Chapters-1-10-PDF (accessed October 6, 2019).

City of Watsonville, 2014. Watsonville Municipal Code, Post-construction Requirements. Available at: https://www.codepublishing.com/CA/Watsonville/#!/Watsonville06/Watsonville0603.html#6-3.535 (accessed October 21, 2019)

State of California Department of Conservation, 2009. Tsunami Inundation Map for Emergency Planning. Available at: https://www.conservation.ca.gov/cgs/Documents/Tsunami/Maps/Tsunami_Inundation_WatsonvilleWest_Quad_SantaCruz.pdf (accessed September 18, 2019).

6.11 Land Use and Planning

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physical divide an established community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	

Conclusion: Regarding land use and planning, the proposed project would not result in any significant environmental impacts.

Documentation:

a. No Impact. The project represents infill development on property with existing access that would remain unchanged. The project would not physically divide a community. While it does involve the construction of 10 new structures for residential and rehabilitation facilities and demolition of an existing treatment center and residences, the project does not involve the construction of a physical structure or removal of a primary access route that would limit mobility within an established community or between a community and outlying areas.

b. Less than Significant Impact. The project site is designated Residential Medium-Density on the General Plan Land Use Map and is within the Multiple Residential-Medium Density (RM-2) Zoning District. A portion of the property with situs address of 139 Miles Lane (APN 016-491-03) is designated Environmental Management on the General Plan Land Use Map and is within the Environmental Management Open Space (EM-OS) Zoning District. The low point on this property is characterized by a perennial stream and riparian habitat.

In general, the project would not cause a significant environmental impact due to conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect, including the Watsonville 2005 General Plan and Watsonville Zoning Ordinance. The project is not located within an adopted specific plan area.

Chapter 9 of the General Plan covers Environmental Resource Management and relates to the avoidance or mitigation of environmental effect to the project and to the designated Environmental Management area associated with the property. This Chapter includes the following Goals and Policies as pertinent to the proposed project and associated Environmental Management designation:

- Goal 9.5 Water Quality – Ensure that surface and groundwater resources are protected.
- Policy 9.D Water Quality – The City shall provide for the protection of water quality to meet all beneficial uses, including domestic, agricultural, industrial, recreational, and ecological uses.
- Goal 9.8 Wildlife Habitat – Preserve and protect the remaining areas of wildlife habitat for their scenic and scientific value.

- Policy 9.F Wildlife Habitat Protection – The City shall designate for open space and environmental management those areas rich in wildlife species and fragile in ecological make-up. These habitat zones shall be made part of the greenbelt where appropriate.

The project is consistent General Plan Goal 9.5 and Policy 9.D concerning the preservation of water quality and water resources. The proposed project does not encroach on the designated Environmental Management stream area. A Wetland Delineation submitted by the applicant for the project indicates that there is a seep wetland approximately 45 feet east of the City designated Environmental Management stream area. An access driveway for the project is proposed as part of project development that would encroach onto the seep wetland. But as mentioned in Section 4.10, Hydrology, potential environmental effects would be less than significant. Because of this, the project would be consistent with the regulations pertaining to the protection of water resources through the implementation of mitigations described in Section 10 Hydrology. The project would also be required to comply with regional waste discharge requirements and the City's regulations to minimize stormwater, surface water, and groundwater pollution, including utilization of BMPs.

The project is consistent with General Plan Goal 9.8 and Policy 9.F regarding the preservation and protection of remaining areas of wildlife habitat. See Section 6.4, Biological Resources, for further discussion.

The project is generally consistent with the purpose of the RM-2 Zoning District, because the development would "…provide rental opportunities for all persons who, by choice or need, may not be purchasing a home." WMC § 14-16.300. Apartments with 17 or more units are allowed conditionally with approval of a Special Use Permit. WMC § 14-16.303(b). The Applicant has also requested establishing a Planned Development (PD) Overlay District as part of the project approvals to allow modifications to setback and minimum net land area requirements.

Allowed residential densities for land designated medium density are between 8 and 13.99 units per net acre. The Applicant has requested a Density Housing Plan that would allow for an increase housing density of 15.1 units per net acre. This plan, and increase of residential density, is allowed per State density bonus law and is consistent with provisions set forth in WMC Section 14-47.130.

In addition, a section of subject APN 106-491-03 (139 Miles Lane) has a designated EM-OS District overlay and would be subject to provisions within the Zoning Ordinance pertaining to land unsuited for development. WMC § 14-16-1900. This section of the parcel is delineated from north to south along the length of 139 Miles Lane and is characterized as a perennial stream. Per the Zoning Ordinance, a 20-foot setback distance is required between the overlay district and any development. Associated development is setback over 30 feet from the stream and EM-OS District.

References:

City of Watsonville, 2005. General Plan. Available at: https://www.cityofwatsonville.org/160/2005-General-Plan (accessed October 6, 2019).

City of Watsonville, 2019. Zoning Ordinance. Available at: https://www.codepublishing.com/CA/Watsonville/ (accessed October 6, 2019).

6.12 Mineral Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✓
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

Conclusion: Regarding mineral resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a. No Impact. The State Board of Mining and Geology has adopted special regulations to protect lands classified as MRZ-2 (i.e., Lands where adequate information indicates that significant stone, sand, and/or gravel deposits are present, or where it is judged that a high likelihood for their presence exists; and lands otherwise designated as areas of statewide or regional significance relative to mineral resources). Mapping conducted in 1986 and 1987 of the project site area Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area, 1986 and 1987, prepared by the State Division of Mines and Geology did not indicate that the City of Watsonville contained any MRZ-2 designated resource zones.

There is an existing operation quarry within the City. While it is not State-identified, it has been identified as significant by the state, with Report No.7, Designation of Regionally Significant Construction Aggregate Resource Areas in the South San Francisco Bay, North San Francisco Bay, Monterey Bay Production-Consumption Regions, January 1987. However, this Quarry is located well beyond City limit. Therefore, the proposed project would not result in the loss of availability of a known mineral resource of value to the region and the residents of the State, and no impact would occur.

b. No Impact. Refer to Section 6.11.a, above. The Watsonville General Plan designates a Regional Significant Construction Aggregate Resources site located along the south side of Buena Vista Drive and southwest of Harkins Slough Road. The proposed project is located over 2.4 miles east of this resource. Therefore, the proposed project would result in no impact.

References:

City of Watsonville, 2005. General Plan. Available at: https://www.cityofwatsonville.org/160/2005-General-Plan (accessed July 24, 2019).

State of California Department of Conservation, 1987. Division of Mines and Geology Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area.

6.13 Noise

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a) Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	
b) Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

Conclusion: Regarding potential noise and vibration impacts, the proposed project would not result in any significant environmental impacts; however, best management practices (BMPs) for the control of temporary construction noise levels are identified and incorporated into the project below.

Documentation:

a. Less than significant. As described further below, the proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project site. This impact would be less than significant.

Noise Fundamentals

"Sound" is a vibratory disturbance created by a moving or vibrating source and is capable of being detected. For example, airborne sound is the rapid fluctuation of air pressure above and below atmospheric pressure. "Noise" may be defined as unwanted sound that is typically construed as loud, unpleasant, unexpected, or undesired by a specific person or for a specific area.

Sound has three properties: frequency (or pitch), amplitude (or intensity or loudness), and duration. Pitch is the height or depth of a tone or sound and depends on the frequency of the vibrations by which it is produced. Sound frequency is expressed in terms of cycles per second, or Hertz (Hz). Humans generally hear sounds with frequencies between 20 and 20,000 Hz and perceive higher frequency sounds, or high pitch noise, as louder than low-frequency sound or sounds low in pitch. Sound intensity or loudness is a function of the amplitude of the pressure wave generated by a noise source combined with the reception characteristics of the human ear. Atmospheric factors and obstructions between the noise source and receptor also affect the loudness perceived by the receptor. The frequency, amplitude, and duration of a sound all contribute to the effect on a listener, or receptor, and whether or not the receptor perceives the sound as "noisy" or annoying. Despite the

ability to measure sound, human perceptibility is subjective, and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms, such as "noisiness" or "loudness."

Sound pressure levels are typically expressed on a logarithmic scale in terms of decibels (dB). A dB is a unit of measurement that indicates the relative amplitude (i.e., intensity or loudness) of a sound, with 0 dB corresponding roughly to the threshold of hearing for the healthy, unimpaired human ear. Since decibels are logarithmic units, an increase of 10 dBs represents a ten-fold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 times more intense, etc. In general, there is a relationship between the subjective noisiness or loudness of a sound and its intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness. Due to the logarithmic basis, decibels cannot be directly added or subtracted together using common arithmetic operations:

$$50\ decibels + 50\ decibels\ \neq 100\ decibels$$

Instead, the combined sound level from two or more sources must be combined logarithmically. For example, if one noise source produces a sound power level of 50 dBA, two of the same sources would combine to produce 53 dB as shown below.

$$10 * \ 10\ log\left(10^{\left(\frac{50}{10}\right)} + \ 10^{\left(\frac{50}{10}\right)}\right) = 53\ decibels$$

In general, when one source is 10 dB higher than another source, the quieter source does not add to the sound levels produced by the louder source because the louder source contains ten times more sound energy than the quieter source.

Although humans generally can hear sounds with frequencies between 20 and 20,000 Hz most of the sound humans are normally exposed to do not consist of a single frequency, but rather a broad range of frequencies perceived differently by the human ear. In general, humans are most sensitive to the frequency range of 1,000–8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. Instruments used to measure sound, therefore, include an electrical filter that enables the instrument's detectors to replicate human hearing. This filter known as the "A-weighting" or "A-weighted sound level" filters low and very high frequencies, giving greater weight to the frequencies of sound to which the human ear is typically most sensitive. Most environmental measurements are reported in dBA, meaning decibels on the A-scale.

Sound levels are usually not steady and vary over time. Therefore, a method for describing either the average character of the sound or the statistical behavior of the variations over a period of time is necessary. The continuous equivalent noise level (Leq) descriptor is used to represent the average character of the sound over a period of time. The Leq represents the level of steady-state noise that would have the same acoustical energy as the sum of the time-varying noise measured over a given time period. Leq is useful for evaluating shorter time periods over the course of a day. The most common Leq averaging period is hourly, but Leq can describe any series of noise events over a given time period.

When considering environmental noise, it is important to account for the different responses people have to daytime and nighttime noise. In general, during the nighttime, background noise levels are generally quieter than during the daytime but also more noticeable due to the fact that household noise has decreased as people begin to retire and sleep. Accordingly, a variety of methods for

measuring and normalizing community environmental noise have been developed. The California Office of Planning and Research's General Plan Noise Element Guidelines identifies the following common metrics for measuring noise (OPR, 2017):

- **Ldn (Day-Night Average Level):** The average equivalent A-weighted sound level during a 24-hour day, divided into a 15-hour daytime period (7 AM to 10 PM) and a 9-hour nighttime period (10 PM to 7 AM). A 10 dB "penalty" is added to measure nighttime noise levels when calculating the 24-hour average noise level. For example, a 45-dBA nighttime sound level (e.g., at 2 AM) would contribute as much to the overall day-night average as a 55-dBA daytime sound level (e.g., at 7 AM).
- **CNEL (Community Noise Equivalent Level):** The CNEL descriptor is similar to Ldn, except that it includes an additional 5 dBA penalty for noise events that occur during the evening time period (7 PM to 10 PM). For example, a 45-dBA evening sound level (e.g., at 8 PM) would contribute as much to the overall day-night average as a 50-dBA daytime sound level (e.g. at 8 AM).

The artificial penalties imposed during Ldn and CNEL calculations are intended to account for a receptor's increased sensitivity to noise levels during quieter nighttime periods. As such, the Ldn and CNEL metrics are usually applied when describing longer-term ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. In contrast, the Leq metric is usually applied to shorter reference periods where sensitivity is presumed to remain generally the same.

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise generating source. The strength of the source is often characterized by its "sound power level." Sound power level is independent of the distance a receiver is from the source and is a property of the source alone. Knowing the sound power level of an idealized source and its distance from a receiver, sound pressure level at the receiver point can be calculated based on geometrical spreading and attenuation (noise reduction) as a result of distance and environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and shielding by terrain or barriers.

For an ideal "point" source of sound, such as mechanical equipment, the energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out in a spherical pattern and travels away from the point source. Theoretically, the sound level attenuates, or decreases, by 6 dB with each doubling of distance from the point source. In contrast, a "line" source of sound, such as roadway traffic or a rail line, spreads out in a cylindrical pattern and theoretically attenuates by 3 dB with each doubling of distance from the line source; however, the sound level at a receptor location can be modified further by additional factors. The first is the presence of a reflecting plane such as the ground. For hard ground, a reflecting plane typically increases A-weighted sound pressure levels by 3 dB. If some of the reflected sound is absorbed by the surface, this increase will be less than 3 dB. Other factors affecting the predicted sound pressure level are often lumped together into a term called "excess attenuation." Excess attenuation is the amount of additional attenuation that occurs beyond simple spherical or cylindrical spreading. For sound propagation outdoors, there is almost always excess attenuation, producing lower levels than what would be predicted by spherical or cylindrical spreading. Some examples include attenuation by sound absorption in air; attenuation by barriers; attenuation by rain, sleet, snow, or fog; attenuation by grass, shrubbery, and trees; and attenuation from shadow zones created by wind and temperature gradients. Under certain meteorological conditions, like fog and low-level clouds, some of these excess attenuation mechanisms are reduced or eliminated due to noise reflection.

Noise Effects on Human Beings

Human response to sound is highly individualized because many factors influence a person's response to a particular noise, including the type of noise, the variability of the sound level, the presence of tones or impulses, and the time of day of the noise occurs. In addition, non-acoustical factors, such as the person's opinion of the noise source, the ability to adapt to the noise, the attitude towards the source and those associated with it, and the predictability of the noise, all influence a person's response. As such, response to noise varies widely from one person to another and with any particular noise, individual responses will range from "not annoyed" to "highly annoyed" with annoyance being an expression of negative feelings resulting from interference with activities, the disruption of one's peace of mind, or degradation of the enjoyment of one's environment.

Noise effects on human beings are generally categorized as:

- Subjective effects of annoyance, nuisance, and/or dissatisfaction
- Interference with activities such as speech, sleep, learning, or relaxing
- Physiological effects such as startling and hearing loss

Most environmental noise levels produce subjective or interference effects. Noise can mask important sounds and disrupt communication between individuals in a variety of settings, resulting in a slight irritation to a serious safety hazard, depending on the circumstance. Noise-induced sleep interference is a critical factor in community and personal annoyance. Sound level, frequency distribution, duration, repetition, and variability can make it difficult to fall asleep and may cause momentary shifts in the natural sleep pattern, or level of sleep resulting in short-term adverse effects such as mood changes, job/school performance, etc.

Physiological effects are usually limited to prolonged and/or repeated exposure to high noise environments at facilities such as, but not limited to, industrial and manufacturing facilities or airports.

Predicting the subjective and interference effects of noise is difficult due to the wide variation in individual thresholds of annoyance and past experiences with noise; however, an accepted method to determine a person's subjective reaction to a new noise source is to compare it to the existing environment without the noise source, or the "ambient" noise environment. In general, the more a new noise source exceeds the ambient noise level, the more likely it is to be considered annoying and to disturb normal activities.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear is able to discern 1-dB changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible; however, it is widely accepted that people are able to begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5 dB increase is generally perceived as a distinctly noticeable increase, and a 10 dB increase is generally perceived as a doubling of loudness that would almost certainly cause an adverse response from community noise receptors.

Existing Noise and Vibration Environment

Located in an urbanized area of the central part of the City, the approximately 4.7-acre project area is generally configured in an east-west orientation and bounded by Miles Lane to the north, residential properties on Crespi Way to the south, commercial properties on Freedom Boulevard to

the east, and Kimberly Lane to the west. The project area currently consists of four, irregularly shaped parcels, partially developed with single-family residential buildings and a residential substance abuse treatment facility.

The General Plan Public Safety Element identifies that transportation noise is the predominant source of noise in the City. Highway 1 and State Route 129 are specifically identified as major sources of noise in the city due to their high traffic volumes and high vehicle travel speed (City of Watsonville, 1990 pgs. 185 and 191); however, the project area is located more than one mile from each of these roadways. The project area is located more than 200 feet from the centerline of Freedom Boulevard, an arterial roadway with a single travel lane in each direction and a posted speed limit of 25 miles per hour (mph). The majority of the project area fronts Miles Lane, a local road with low traffic volumes.

Existing traffic noise levels for Freedom Boulevard and Miles Lane were computed using the U.S. Department of Transportation Federal Highway Administration's Traffic Noise Model (TNM), Version 2.5. The model uses traffic volume, vehicle mix, vehicle speed, roadway geometry, and other variables to compute 24-hour traffic noise levels at user-defined receptor distances from the roadway center. The TNM modeling conducted for the project incorporates worst-case assumptions about motor vehicle traffic and noise levels; specifically, calculations are based on "hard" site conditions and do not incorporate any natural or artificial shielding.

Information on existing average daily traffic volumes was obtained from Santa Cruz County, the Traffic Impact Study prepared for the project (Kimley Horn, 2019), and Caltrans peak hour traffic count information (Caltrans, 2017). Traffic noise levels were estimated on a 24-hour, CNEL exposure basis assuming equal hourly distribution of vehicle traffic. The mix of automobiles (94%), medium (2%) and heavy duty trucks (1%), and motorcycles (3%) assigned to the roadway system was generated using the CARB EMFAC2017 model, which contains vehicle population data by different geographic regions. This vehicle mix was assumed for Freedom Boulevard. The vehicle mix for Miles Lane was assumed to consist entirely of automobiles (97%) and motorcycles (3%) because it is a local road. Vehicles were assumed to travel 25 miles per hour. The results of the modeling indicate existing traffic noise levels at the site are less than 60 CNEL. Please refer to Appendix D for detailed information on existing and existing plus project traffic noise modeling assumptions.

The General Plan Public Safety Element also identifies portions of the City are affected by airport and railroad noise sources. The project area lies approximately 0.9 miles north of the closest rail line (near Beach Street) and 1.4 miles southeast of the Watsonville Municipal Airport. These distances are as measured between the center of the nearest track/runway to the closest project property line.

Non-transportation sources also contribute to the City's existing noise environment. Residential and commercial land uses located near the project area generate noise from daily operations of landscaping equipment, stationary sources such as heating, ventilation, and air conditioning (HVAC) equipment, business deliveries, solid waste pickup services, etc. Such sources are considered local source of noise that only influence the immediate surroundings.

Noise Sensitive Receptors

Noise sensitive receptors are buildings or areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Residential areas, hospitals, schools, and parks are examples of noise sensitive receptors that could be sensitive to changes in existing environmental

noise levels. The noise sensitive receptors adjacent or in close proximity (within 1,000 feet) of the perimeter of the proposed project include:

- Single- and multi-family homes on Miles Lane, north of the project site;
- Mobile homes on Crespi Way, south of the project site;
- Single-family homes on Kimberly Lane, southwest of the project site; and
- Single-family homes on Santa Clara Street, west of the project site.

Applicable Noise Standards

The California Building Standards Code is contained in Title 24 of the California Code of Regulations and consists of 11 different parts that set various construction and building requirements. Part 2, California Building Code, Section 1207, Sound Transmission, establishes sound transmission standards for interior walls, partitions, and floor/ceiling assemblies. Specifically, Section 1207.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room.

The California Green Building Standards Code is Part 11 to the California Building Standards Code. Chapter 5, Nonresidential Mandatory Standards, Section 5.507 establishes the following requirements for non-residential development that may be applicable to the proposed project.

- 5.507.4.1.1 sets forth that buildings exposed to a noise level of 65 dB Leq (1-hour) during any hour of operation shall have exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composting sound transmission class (STC) rating of at least 45 (or an outdoor indoor transmission class (OITC) of 35), with exterior windows of a minimum STC of 40.
- Section 5.507.4.2 sets forth that wall and roof assemblies for buildings exposed to a 65 dBA Leq pursuant to Section 5.507.4.1.1, shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA Leq in occupied areas during any hour of operation. This requirement shall be documented by preparing an acoustical analysis documenting interior sound levels prepared by personnel approved by the architect or engineer of record.

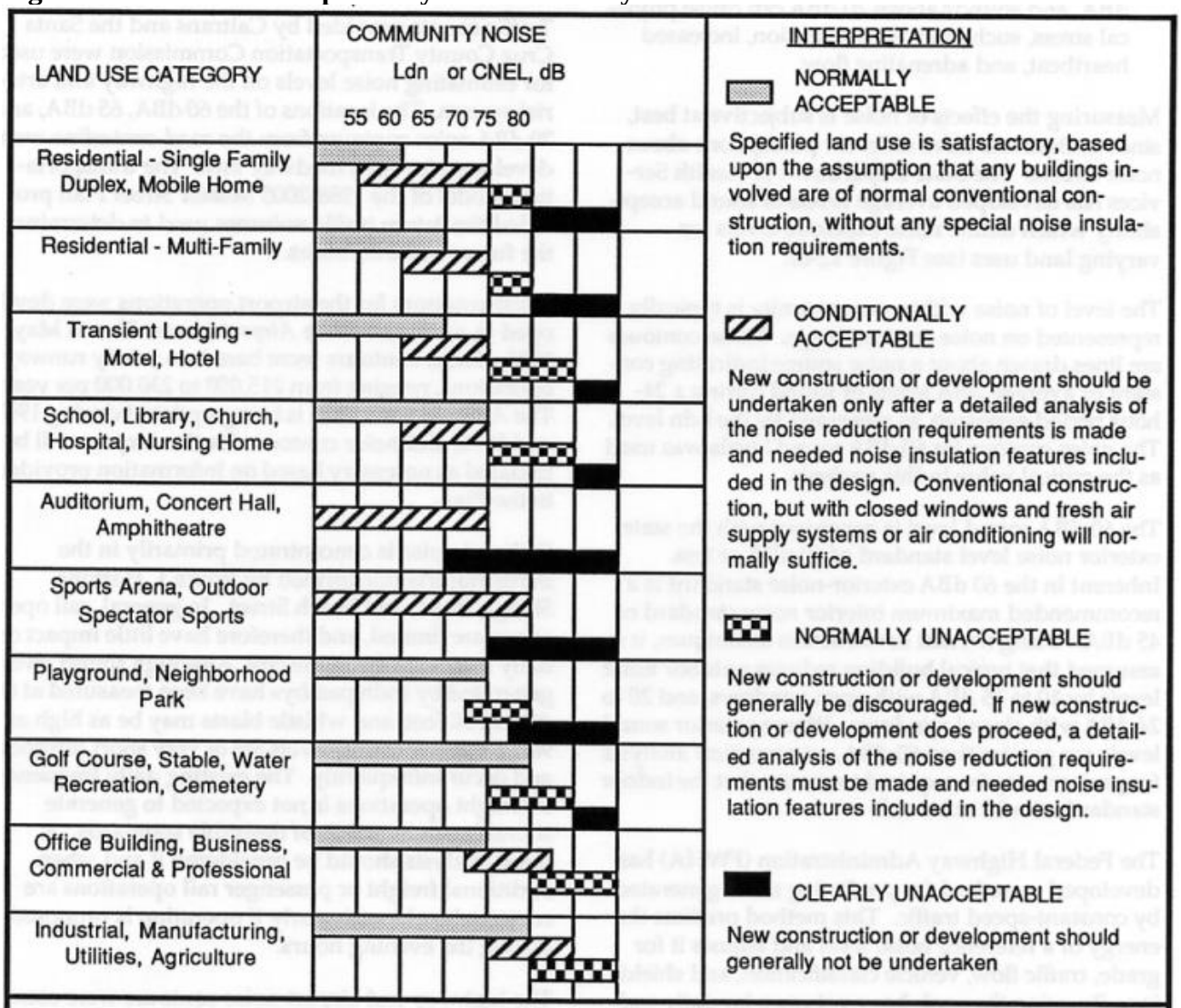
Watsonville General Plan Chapter 12, Public Safety, of the Watsonville General Plan includes the following goals and policies relevant to the proposed project:

- **Goal 12.8 Noise Hazard Control.** Evaluate new and existing land uses in the city for compatibility related to noise effects and require, as appropriate, mitigation where harmful effects can be identified, and measurable improvement will result.

- **Policy 12.M Noise.** The City shall utilize land use regulations and enforcement to ensure that noise levels in developed areas are kept at acceptable levels, and that future noise-sensitive land uses are protected from noise that is harmful.

The Public Safety Element also identifies the City's noise compatibility guidelines for different land uses. According to Figure 12-6 of the General Plan, the normally acceptable noise limit for single family residential land uses is 60 CNEL, while the limit for multi-family residential land uses is 65 CNEL. In addition, the normally acceptable noise limit for hospitals, nursing homes, and office or professional land uses is 75 CNEL.

Figure 13. Land Use Compatibility for Community Noise Environments[3]



[3] *Source:* Watsonville 2005 General Plan, Figure 12-6

Watsonville Municipal Code To implement the City's noise policies, the City adopted Chapter 8, Noise, in Title 5, Public Welfare, Morals, and Conduct, of the Watsonville Municipal Code (WMC). WMC Chapter 5-8 prohibits specific types of noises, such as continuous or unusually loud noise which disturbs residential property or public ways within the City. Specifically, it is unlawful for any person to generate noise which either annoys, disturbs, injures, or endangers the comfort, repose, health, peace, or safety of others on residential property or public ways within the City, including, but not limited to:

- The use of radios, music instruments, stereos, televisions, or other similar devices that disturb the peace and quiet of neighboring residential inhabitants, including the use of such devices between the hours of 10 PM and 7 AM that are plainly audible at a distance of 50 feet from the structure in which the device is located (WMC Section 5-8.02(a)).
- Yelling, shouting, hooting, whistling, or signing originating from any residential property or upon any public way at any time so as to annoy or disturb the quiet comfort and repose of nearby persons (WMC Section 5-8.02(c)).

Noise Impact Analysis

Temporary Construction Noise
As described in Section 6.3, Air Quality, the proposed project involves the construction of a 61-unit affordable housing development and re-development and expansion of the existing residential substance abuse treatment and outpatient rehabilitation facility over an approximately 16-month period, beginning in May 2020. Construction activities would disturb approximately 4.7 acres, and would include demolition, site preparation, grading, construction, paving, and architectural coating work. project construction activities, duration, and typical equipment usage are shown in Table 2, *Construction Activity, Duration, and Typical Equipment*.

Project construction would require the use of heavy-duty construction equipment that could temporarily increase noise levels at adjacent property lines near work areas. The type of equipment used would include bulldozers, backhoes, a grader, a scraper, compactors/rollers, small cranes, and material handlers, lifts, and trucks. Table 7 presents the estimated, worst-case noise levels that could occur from operation of typical construction equipment used to develop the project. During demolition, site preparation, grading, and paving activities construction equipment would operate throughout the site, moving closer to one property line and farther away from another; building construction and architectural coating activities would be concentrated in the center of the site. For these reasons, potential construction noise levels are estimated for worst-case equipment operations (50-feet from a property line) and average equipment operations (approximately 150 feet from property lines).

Table 8. Typical Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (Lmax)[A]	Percent Usage Factor[B]	Predicted Noise Levels (Leq) at Distance[C]	
			50 Feet	150 Feet
Bulldozer	85	40	81	71
Backhoe	80	40	76	66
Compact Roller	80	20	73	63
Concrete Mixer	85	40	81	71
Crane	85	16	77	67
Excavator	85	40	81	71
Generator	82	50	79	69
Pneumatic tools	85	50	82	72
Scraper	85	40	82	72
Delivery Truck	85	40	81	71

Sources: Caltrans, 2013 and FHWA, 2010.

(A) L_{max} noise levels based on manufacturer's specifications.

(B) Usage factor refers to the amount of time the equipment produces noise over the time period.

(C) Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2009: L_{eq} (hourly) = L_{max} at 50 feet – 20log (D/50) + 10log (UF), where: L_{max} = reference L_{max} from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

The worst-case Leq noise levels associated with the operation of a bulldozer and scraper are predicted to be approximately 81 and 82 dBA, respectively, at a distance of 50 feet from the equipment operating area. At an active construction site, it is not uncommon for two or more pieces of construction equipment to operate at the same time and in close proximity. A single bulldozer provides a sound level of 81 dBA Leq at a distance of 50 feet; when two identical sound levels are combined, the noise level increases to 84 dBA Leq and when three identical sound levels are combined, the noise level increases to 86 dBA Leq. These estimates assume no shielding or other noise control measures are in place at or near the work areas. These maximum noise levels would occur for a short period time; as demolition (5 days), site preparation (18 days) and grading (15 days) is completed and building construction begins, work activities would occur further from property lines and generate lower construction noise levels.

The City does not maintain numeric thresholds for the purposes of evaluating construction noise levels; however, the noise levels of 85 dBA Leq are typically considered intrusive and would have the potential to interfere with the quiet, comfort, and use of adjacent, exterior residential areas, particularly the residential areas on Crespi Way.

The noise generated from project construction would be temporary and would not produce the same sound levels every day. In addition, the City does not maintain numeric thresholds for the purposes of evaluating construction noise level. Neither the General Plan nor the Watsonville Municipal Code specify a noise level for construction activities. Project construction noise, therefore, would not exceed an applicable standard and would not result in a significant impact. Nonetheless, noise levels of 85 dBA Leq on an hourly basis are typically considered intrusive and would have the potential to interfere with the quiet, comfort, and use of adjacent, exterior residential areas, particularly the residential areas on Crespi Way. The City will require the implementation of BMPs as conditions of project approval to reduce the potential for construction noise levels to annoy and intrude upon adjacent residential areas.

These BMPs would reduce construction noise levels and provide a mechanism for responding to construction noise complaints, thereby ensuring project construction would not result in a substantial, temporary increase in noise levels.

Construction Noise Control Best Management Practices: The City shall require the Applicant to incorporate the following construction noise best management practices into all applicable project bid, design, and engineering documents:

1) Construction work hours shall be limited to the hours of 7 AM to 10 PM.
2) The sign shall also provide a contact name and phone number for the job site and the project's representative for addressing noise concerns.
3) Heavy equipment engines shall be covered and exhaust pipes shall include a muffler in good working condition.
4) Stationary equipment such as compressors, generators, and welder machines shall be located as far away from surrounding residential land uses as possible. The project shall connect to existing electrical service at the site to avoid the use of stationary, diesel- or other alternatively-fueled power generators, if feasible.
5) Impact tools such as jack hammers shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. When use of pneumatic tools is unavoidable, it shall be ensured the tool will not exceed a decibel limit of 85 dBA at a distance of 50 feet. Pneumatic tools shall also include a noise suppression device on the compressed air exhaust.
6) No radios or other amplified sound devices shall be audible beyond the property line of the construction site.
7) Prior to the start of any construction activity, the Applicant or its contractor shall prepare a Construction Noise Complaint Plan that identifies the name and/or title and contact information (including phone number and email) of the Contractor and District-representatives responsible for addressing construction-noise related issues and details how the District and its construction contractor will receive, respond, and resolve to construction noise complaints. At a minimum, upon receipt of a noise complaint, the Applicant and/or Contractor representative identified in the Plan shall identify the noise source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint.

Exterior Noise / Land Use Compatibility

The proposed project consists of a residential substance abuse treatment facility, an outpatient rehabilitation facility, and a 61-unit affordable housing development. According to the City's General Plan land use and noise compatibility guidelines, the normally acceptable noise limits for multi-family residential land uses such as the proposed project is 65 CNEL. The predominant noise source in the vicinity of the project site is vehicle traffic on Freedom Boulevard and Miles Lane. As shown in Table 8, the traffic noise modeling conducted for the project indicates existing and existing plus project traffic noise levels for these roadways would, at most, be 63.0 dBA, at the project property line closest to Freedom Boulevard. The proposed project, therefore, is considered compatible with the existing and projected ambient noise level at the project site.

Table 9. Net Change in ADT and Traffic Noise Levels

Road	Segment	Existing		Future		Net Change	
		ADT	CNEL(A)	ADT	CNEL(A)	ADT	CNEL(A)
Freedom Blvd.	Marin St. to Stanford St.	26,754	62.9	26,921	63.0	167	0.1
Miles Lane	Freedom Blvd. to Santa Clara St.	1,209	53.8	1,543	54.9	334	1.1

Source: MIG 2019 (see Appendix D).

(A) All CNEL values are presented at the closest property line to the modeled roadway, which is a distance of 200 feet from the center of Freedom Boulevard and 50 feet from the center of Miles Lane.

Interior Noise Level Compatibility

Part 2, California Building Code, Section 1207.4 establishes that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA DNL or CNEL (as set by the local General Plan) in any habitable room. In addition, Chapter 5 of the California Green Building Standards Code sets forth that buildings exposed to a noise level of 65 CNEL (where noise contours are available) or 65 dBA Leq (1-hour where noise levels are not available) shall:

1) have exterior wall and roof-ceiling assemblies exposed to the noise source that meeting a composite sound transmission class (STC) rating of at least 50 (or a composite outdoor indoor transmission class (OITC) rating no less than 40), with exterior windows of a minimum STC of 40 or OITC 30 (Section 5.507.4.1); or
2) provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA Leq in occupied areas during any hour of operation.

As described above, traffic noise modeling indicates ambient noise levels at the site are would be no more than 63 CNEL. Standard construction techniques and materials for new residential buildings are commonly accepted to provide a minimum exterior to interior noise attenuation (i.e., reduction) of 20 to 30 dBA with windows and doors closed, which would result in interior noise levels of no more than approximately 43 CNEL for all habitable rooms fronting Freedom Boulevard.* Thus, with standard construction techniques, the proposed project would satisfy interior building code noise requirements.

Potential On-Site Operational Noise Levels

Once constructed, the proposed project would generate noise from daily activities typical of residential-type facilities, including on-site vehicle trips, operation of HVAC units, landscaping and maintenance activities, waste-disposal truck traffic, etc. Specifically, the proposed project's on-site noise sources would include:

- Automobile travel along on-site roads, automobile parking, and other miscellaneous automobile noise sources such as doors closing and engine start-up and revving. The project's potential mobile noise sources would not operate continuously. Once parked and engines shut off, noise would cease to be generated.

* The U.S. Department of Housing and Urban Development (HUD) Noise Guidebook and supplement (2009a, 2009b) includes information on noise attenuation provided by building materials and different construction techniques. As a reference, a standard exterior wall consisting of 5/8-inch siding, wall sheathing, fiberglass insulation, two by four wall studs on 16-inch centers, and 1/2-inch gypsum wall board with single strength windows provides approximately 35 dBs of attenuation between exterior and interior noise levels. This reduction may be slightly lower (2-3 dBs) for traffic noise due to the specific frequencies associated with traffic noise.

- Potential rooftop-mounted HVAC units that would be sized to accommodate the residential treatment and affordable housing units. Such units are typically located in the center of a residential building, behind a parapet wall shields the HVAC unit from the street and serves to reduce potential HVAC unit noise levels at adjacent property lines.**
- Waste collection services, which would occur toward the interior of the site.
- Human use of common areas, such as the proposed community garden, on-site trail, and courtyard areas.

The project noise sources described above would not have the potential to generate substantial noise levels that could exceed the City's noise compatibility guidelines for adjacent residential areas (60 CNEL for single family, duplex, and mobile home land uses and 65 CNEL for multi-family land uses). The project site plan shows buildings would be located throughout the site and thus potential noise generating activities would be distributed throughout the site and would not affect any one receptor. The residences on Crespi Way, which border the site's southern property line, would be shielded from on-site noise sources by proposed buildings (e.g., Building 9 in the southwest corner of the site), parking area / trash enclosure walls, or property line setbacks. There is also a 12-foot wide trail easement in the southeast corner of the site that would buffer the parking area in this part of the site from adjacent land uses. The project's potential on-site noise levels would, therefore, be less than significant.

Potential Off-Site Traffic Noise Levels

The proposed project would generate traffic that would be distributed onto the local roadway system and potentially increase noise levels along travel routes. Caltrans considers a doubling of total traffic volume to result in a three dBA increase in traffic-related noise levels (Caltrans, 2013a). If the proposed project would not result in a doubling of traffic volumes on the local roadway system, it would not result in a substantial permanent increase in traffic-related noise levels.

The TIS prepared for the proposed project indicates that the project would result in 334 new trips per day, including 38 trips during the PM peak hour. In addition, the TIA identifies that most project-related traffic would be concentrated on Miles Lane, Santa Clara Street, and Freedom Boulevard, the primary roads used to access the site. The existing peak hour vehicle trips on Miles Lane, Santa Clara Street and Freedom Boulevard are approximately 103, 338, and 1,813 trips. Therefore, the project would increase existing peak hour vehicle trips by no more than approximately 36% on Miles Lane.

The proposed project would result in substantially less than a doubling of peak hour and daily traffic volumes (see Table 15) on roadways used to access the site and, therefore, would not result in a substantial, permanent increase in noise levels along the roadways used to access the project.

b. Less than Significant. As described further below, the proposed project would not generate excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.

Vibration Background Information

Vibration is the movement of particles within a medium or object such as the ground or a building. Vibration may be caused by natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves,

** Common building materials such as wood framing materials, plywood, and light concrete/stucco all have transmission loss rating greater than 20 dBA to 25 dBA and are capable of reducing transmitted sound levels by 10 to 15 dBA at minimum. .

landslides) or humans (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources are usually characterized as continuous, such as factory machinery, or transient, such as explosions.

As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency; however, unlike airborne sound, there is no standard way of measuring and reporting amplitude. Vibration amplitudes can be expressed in terms of velocity (inches per second) or discussed in dB units in order to compress the range of numbers required to describe vibration. As with airborne sound, the groundborne velocity can also be expressed in decibel notation as velocity decibels, or dBV (FTA, 2018). The vibration of floors and walls may cause perceptible vibration, rattling of items such as windows or dishes on shelves, or a low-frequency rumble noise, referred to as groundborne noise. This report uses peak particle velocity (PPV) to describe vibration effects. Vibration impacts to buildings are usually discussed in terms of PPV in inches per second (in/sec). PPV represents the maximum instantaneous positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (e.g., crack plaster or destroy windows). Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments, such as an electron microscope.

Common sources of vibration within communities include construction activities and railroads. Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities. Next to pile driving, grading activity has the greatest potential for vibration impacts if large bulldozers, large trucks, or other heavy equipment are used.

Caltrans' *Transportation and Construction Vibration Guidance Manual* provides a summary of vibration criteria that have been reported by researchers, organizations, and governmental agencies (Caltrans, 2013a). Chapter six of this manual provides Caltrans' guidelines and thresholds for evaluation potential vibration impacts on buildings and humans from transportation and construction projects. These thresholds are summarized in Tables 9 and 10.

Table 10. Caltrans' Vibration Threshold Criteria for Building Damage

Structural Integrity	Maximum PPV (in/sec)	
	Transient	Continuous
Historic and some older buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial and commercial structures	2.00	0.50
Source: Caltrans, 2013a		

Table 11. Caltrans' Vibration Threshold Criteria for Human Response

Human Response	Maximum PPV (in/sec)	
	Transient	Continuous
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severely perceptible	2.00	0.40
Source: Caltrans, 2013a		

Vibration Impact Analysis

The potential for groundborne vibration is typically greatest when vibratory or large equipment such as rollers, impact drivers, or bulldozers are in operation. The geotechnical report prepared for the proposed project does not identify any unusual or unique geotechnical considerations that require special, vibration-generating equipment (e.g., pile drivers). For the proposed project, the largest earthmoving equipment would primarily operate during demolition, site preparation, grading, and paving work. This equipment would, at worst-case and for limited periods of time (e.g., two weeks for demolition, see Table 2), operate adjacent to the site's property lines and within approximately 25 feet of the residences located adjacent to the project site on Miles Lane, Kimberly Lane, and Crespi Way; however, most site work would occur at least 50 feet or more from project property lines. Table 11 lists the typical vibration levels generated by the type of heavy-duty construction equipment most likely to be used during project construction, as well as the estimated vibration levels at distances of 25 feet (the closest residences to potential work areas), 50 feet, 100 feet, and 400 feet from the project site.

Table 12. Potential Groundborne Vibration Levels

Equipment	Peak Particle Velocity(A) (Inches/Second) at Distance			
	25 Feet	50 Feet	100 Feet	400 Feet
Vibratory Roller	0.21	0.085	0.035	0.006
Large Bulldozer	0.089	0.036	0.015	0.002
Small Bulldozer	0.03	0.012	0.005	0.001
Loaded Truck	0.076	0.031	0.013	0.002
Jackhammer	0.035	0.014	0.006	0.001

Sources: Caltrans, 2013a and FTA 2018.
(A) Estimated PPV calculated as: PPV(D)=PPV(ref*(25/D^1.3 where PPV(D)= Estimated PPV at distance; PPVref= Reference PPV at 25 ft; D= Distance from equipment to receiver; and n= ground attenuation rate (1.3 for competent sands, sandy clays, silty clays, and silts).

As shown in Table 11, construction equipment vibration levels from a roller, large bulldozer, or small bulldozer, could exceed Caltrans vibration detection thresholds (see Table 10) for "barely perceptible" (0.035 inches/second) and approach thresholds for "distinctly perceptible" (0.24 inches/second) when operating in close proximity (within 25 feet) to adjacent residences and would, therefore, likely be perceptible at these building locations. This, however, is not considered to be excessive, because any equipment operation near property lines would be short in duration and intermittent (lasting only a few hours or days in work areas closest to building locations). As

construction equipment moves around the site and operates at distances of 50 feet or more from nearby residences, vibration levels would begin to drop to levels that would not be perceptible according to Caltrans' thresholds. Additionally, potential construction vibration levels would not result in structural damage because the estimated vibration levels are substantially below Caltrans' thresholds for potential damage to even the most sensitive of residential buildings (0.50 inches/second for older, un-reinforced concrete masonry buildings or historic buildings). Thus, short-term, intermittent construction equipment vibration levels would not be excessive.

Once operational, the proposed project would not result in the operation of sources that would generate substantial groundborne vibration levels.

c. No Impact. The proposed project area is located 1.4 miles southeast of Watsonville Municipal Airport. The proposed p[roject area is located adjacent to a recognized "noise sensitive area" according Watsonville Municipal Airport Noise Abatement Map, which are areas where the Airport specifies the use of best practices and noise abatement procedures to control airport-related noise levels (City of Watsonville, 2019). Furthermore, the project area is not located within any existing or future noise contour zone associated with airport operations (City of Watsonville 2002, 2012). For these reasons, the proposed project would not expose people residing or working in the project area to excessive public or private airport-related noise levels.

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6.14 Population and Housing

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			✓	

Conclusion: Regarding population and housing, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. Residential uses are included in the project; therefore, the project would result in direct residential growth. According to the U.S. Census Bureau's American Fact Finder tool, the estimated 2018 population of Watsonville was 53,920. The 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (2040 MTP/SCS) was developed by the Association of Monterey Bay Area Governments (AMBAG) in 2018 and contains growth projections for the City of Watsonville (AMBAG 2040 MTP/SCS 2018). According to AMBAG, the population of Watsonville is anticipated to grow to 59,743 in 2040, adding 5,823 new residents between 2018 and 2040. The population of Santa Cruz County is expected to increase to 306,881 residents, adding approximately 32,626 residents to the U.S. Census Bureau's 2018 population estimates for the County (Bureau Quick Facts). As further discussed below, the project is anticipated to add 212 residents, which represents 3.6% of the 5,823 anticipated new residents citywide.

The City of Watsonville is primarily a community of families. The proportion of families in Watsonville increased from 78% in 2000 to 80% in 2010. In particular, the numbers of married couples with children and other families grew noticeably, by 17% and 27%, respectively. Reflecting the increase in the number and proportion of families, the average household size did not grow, decreasing from 3.98 persons per household in 2000 to 3.75 persons per household in 2010. Household size and composition is a complex issue, often reflective of market conditions as well as demographic factors. The high cost of housing in Watsonville and throughout Santa Cruz County, coupled with the lower incomes of many Watsonville residents has resulted in many families doubling up, creating an issue of overcrowding. In addition, cultural preference toward living with the extended family has contributed to this phenomenon.

According to the Housing Element, the high prevalence of overcrowding is in part to the number of large households present in Watsonville. Large households are defined as households having five or more members residing in the home. Because of high housing cost, families and/or extended families live together under one roof. According to the 2010 Census, approximately 4,119 households, or 29.8% of total households, in Watsonville live in overcrowded conditions and approximately 4,213, or 30.5% of total households, overpay for housing (Watsonville Housing Element 2016).

The project is anticipated to house 212 residents total through the residential treatment program and the 61 proposed residential units of the affordable housing development. The affordable housing component would consist of a combination of studio (6 units), one-bedroom (18 units), two-bedroom (18 units) and three-bedroom (19 units) units and would house an estimated 195 permanent residents (including one manager). The residential treatment program would have a maximum housing capacity of 30 residents, though the project applicant anticipates housing an average of 17 program clients per night. Therefore, in total, the project is anticipated to house 212 residents.[4] This level of growth is within the growth forecasts developed for the 2040 MTP/SCS and would represent 3.6% of the 5,823 anticipated new Watsonville residents between 2018 and 2040.

To address overcrowding, the City is working to develop housing opportunities for all sized households to relieve overcrowding and to promote affordable ownership housing opportunities. The proposed project would provide housing for residents currently living in overcrowded housing situations thus likely reducing the overall population increase. Furthermore, the project does not include any major infrastructure expansion and therefore would not result in any indirect population growth. In addition, it is likely that the population increase may be less than 212, as some of the residents of the new development may already live in Watsonville. Because much of the City is subject to overcrowding, the project would potentially help alleviate this issue by allowing families who are currently living in large households to move and reside in the proposed project.

There would be a short-term increase in construction jobs during project construction. It is anticipated that workers would be employed locally and live within Watsonville or in nearby towns and/or adjacent counties. This impact would be short-term and less than significant.

After the project is built, the affordable housing development would employ three full-time employees: a manager (who would also be a permanent resident), a maintenance employee, and a resident services employee. The residential treatment facility would employ 15 people (a one person increases from the 14 existing Encompass facility FTE count) and the outpatient medical facility is anticipated to employ eight people, all of which would be transferred from an existing outpatient facility located on Auto Center Drive in the City.

The project would be located on four parcels, two of which are vacant, on Miles Lane. The two vacant parcels are "Vacant Residential Parcels" designated for housing in the City's 2015-2023 Housing Element (p. 70). The project applicant is submitting a Density Bonus Housing Plan to request approval to increase the allowed density of the project site to 15.10 units per acre (a 7.93% increase), which would allow for development of 61 rental residential units. The units would be 100% affordable and accommodate people of low, very low, and extremely low-income levels. The project's addition of 61 affordable residential apartment units and one 7,389 square-foot residential treatment program facility that would house 17 people per night would implement the City Housing Element objective of utilizing vacant residential parcels for housing. As a result, impacts on City population growth from employment and residential population growth would be less than significant.

b. Less than Significant Impact. Currently, the project site contains two homes used by the Encompass substance abuse facility and housing program, three rental homes, one transitional rental

[4] Calculation: 195 (affordable housing residents) + 17 (residential treatment program clients) = 212

home, and one vacant, uninhabitable home, for a total of seven homes. All homes would be demolished as part of the project.

The project has the potential to displace the occupants of the homes described above. However, the new housing development of 61 residential units would have capacity to house those displaced by build-out of the project. Because new residential units would provide housing for low, very low, and extremely low-income households, units prices would most likely not be a deterrent to existing residents who may elect to secure housing in the new development.

Because the project would not displace substantial numbers of existing people or housing, and existing residents could feasibly be accommodated by the project's proposed affordable housing development, project impacts would be less than significant.

References:

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6.15 Public Services

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection			✓	
b) Police protection			✓	
c) Schools			✓	
d) Parks			✓	
e) Other Public Facilities			✓	

Conclusion: Regarding public services, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. The City of Watsonville is served by the Watsonville Fire Department. The Watsonville Fire Department includes Fire Suppression, Emergency Medical Services, Fire Training and Fire Prevention Divisions. The Watsonville Fire Department provides services related to fire prevention, training and safety, which includes public education and inspection services, and standard fire department operations, which includes emergency response and development of hazard pre-incident plans. The Watsonville Fire Department protects the 6.6 square miles of the City and its 53,920 residents. In addition to City residents, the Fire Department provides service to unincorporated areas around the City of Watsonville, which increases the service area to approximately 14 square miles and a population of 60,000 (Watsonville Fire).

The Watsonville Fire Department currently operates two open fire stations, Station 1 and Station 2. Station 1 is staffed with 6-7 rotating fire fighters with one engine. Station 2 is staffed with 3-4 rotating fire fighters and one engine. All stations are staffed with paramedics on call.

The closest fire station to the project site is Station 1, located at 115 Second Street, 1.02 miles southwest of the project site. This station would be the first station to respond to calls originating from the project site. Station 2 is located at 370 Airport Boulevard approximately 1.4 miles north of the project site and would provide the secondary response. The proposed project is anticipated to marginally increase demand for protection services, but it is not expected to compromise response times, exceed planned staffing levels or equipment, nor require the construction of additional fire facilities. In addition, the Watsonville Fire Department and Fire Inspector in the Community Development Department would review the design of the proposed project structures prior to the

issuance of a building permit to ensure the proper incorporation of adequate fire and life safety features into the design of the project.

The proposed project will comply with the City 2005 General Plan Safety Element policies related to fire protection. These policies, the subjects of which are identified in Table 12, help ensure the increases in population do not impact fire services to a degree that new or expanded facilities would be required (Watsonville 2005 General Plan, p. 194).

Table 13. Watsonville 2005 General Plan Public Safety Element Policy 12.F Fire Safety Standards

Policy Number	Implementation Measures – Subject Matter
12.F.1	Access
12.F.2	Cul-de-Sacs
12.F.3	Private Access Roads
12.F.4	Road Construction
12.F.5	Width and Vertical Clearance
12.F.6	Alleys
12.F.7	Emergency Access
12.F.8	Fire Flow
12.F.9	Open Area
12.F.10	Building Safety
12.F.11	Built-In Fire Protection
12.F.12	Street Name and Numbering
12.F.13	Fire Cause Investigation

The City has also adopted the California Fire Code (Chapter 9 of the municipal code) with modifications for local conditions. Applicable policies from the code include:

- 8-9.304 Combustible waste material: Including weeds, grass, vines or other growth capable of being ignited and endangering property, will be removed by the owner or occupant.
- 8.9-903 Automatic sprinkler systems: All buildings will be required to have approved automatic sprinkler systems in new buildings and structure.

As a result, the proposed project would result in less than significant impacts related to fire protection.

b. Less than Significant Impact. The City of Watsonville is under the jurisdiction of the City of Watsonville Police Department (WPD). WPD provides police protection services throughout the City. WPD headquarters are located at 215 Union Street, approximately 1.04 miles south of the proposed project. The WPD offers many police services including an abandoned vehicle program, alarm system registration, information, dispatch, garage sale permits, live scans, and educational opportunities (City of Watsonville 2019 6d).

The proposed project would create 61 units of affordable housing in a residential area. The proposed project is anticipated to marginally increase demand for police protection services but is not expected to compromise response times or exceed planned staffing levels/equipment nor directly require the construction of additional police facilities. In addition, the project site is located where existing residential uses are located. Therefore, the proposed project would not result in substantial adverse physical impacts to police service facilities. The impact would be less than significant.

c. Less than Significant. The project site is served by the Pajaro Valley Unified School District (PVUSD); the district operates seven alternative and charter schools, 16 elementary schools, nine secondary schools, and one adult education school (City of Watsonville 2019 6b). According to the PVUSD school district locator tool, the project site would be served by H.A. Hyde Elementary School (grades K-5) located at 125 Alta Vista Avenue, Cesar Chaves Middle School (grades 6-8) located at 440 Arthur Road, and Pajaro Valley High School (grades 9-12) located at 500 Harkins Slough (My School Locator 2019). Their capacity as of 2011 and average enrollments between 2013 and 2018 and for the 2017-2018 academic year are summarized in Table 13.

Table 14: School Capacity and Enrollment

School	Capacity	Enrollment (5-year average)[3]	Enrollment 2017-2018[3]
H.A. Hyde Elementary School	748[1]	580	546
Cesar Chavez Middle School	751[1]	610	636
Pajaro Valley High School	2,200[2]	1,442	1,406

Sources: [1]As of 2011. Source: PVSUD Comprehensive Facilities Master Plan 2012-2022.
[2] Enrollment capacity is limited to 2,200 students under the Coastal Development Permit.
[3] EdData (Education Data Partnership) data on PVUSD.

The proposed project would result in incremental population growth, including school-age children who would attend PVUSD schools. The U.S. Census Bureau American Community Survey (ACS) estimates that 24.7% of the population in Watsonville is between the ages of five and 19 (roughly the ages of K-12 population) in 2017. Using this as an assumption, the project would have an estimated 53 (rounded up from 52.4) youth in the K-12 age range. It should be noted that some parents or guardians may elect to send their children to private schools or utilize home-schooling programs. Regardless, the estimate of 53 K-12 aged students (or roughly five students per grade) was used to assess the project's potential impact on school district. This would result in 30 students at H.A. Hyde Elementary School, 15 students at Cesar Chavez Middle School, and 20 students at Pajaro Valley High School. Using the five-year average, all schools have capacity for the new students the project would generate.

H.A. Hyde Elementary School has a 5-year average of 580 students. H.A. Hyde Elementary School could receive approximately 610 students with the proposed project. This is less than the 748-student capacity. Cesar Chavez Middle school has a 5-year average of 610 students. Cesar Chavez Middle school could receive approximately 625 students with the proposed project. This is less than the 751-student capacity. Pajaro Valley High School has a 5-year average of 1,442 students. Pajaro Valley High School could receive approximately 1,462 students with the proposed project. This is less than the 2,200-student capacity. In the event capacity exceedance does occur, exceedance would be temporary, as enrollments fluctuate.

The payment of development fees would offset the costs incurred by PVUSD associated with providing facilities for the additional students. In accordance with California Government Code and the PVUSD, the Applicant would be required to pay standard school facilities impact fees: currently $5.02 per residential square foot and $0.07 per square foot for parking lots/structures (City of Watsonville 2019 6a). To offset any incremental impacts of the proposed project on existing school

facilities. According to AB 2926, payment of developer fees constitutes adequate mitigation for any project-related impacts to school facilities. Impacts to school facilities would be less than significant.

d. Less than Significant Impact. The proposed project includes residential dwelling units that would result in population growth that would incrementally increase demand on local and regional recreation facilities. The City operates 26 parks (see parks list in Section 6.16 Recreation) totaling 143 acres, and the City's population was 53,920. In addition, parks managed by Santa Cruz County, Monterey County, Santa Clara County, and the State are located within 20 miles of the project site. The Forest of Nisense Marks State Park, with over 10,000 acres of State-owned park lands, located approximately 11 miles (as the crow flies) from the project site would provide the closest State Parks-maintained outdoor recreation opportunities in the area (California State Parks 2019). These facilities provide a variety of recreational opportunities for existing residents and future residents. Moreover, the proposed project includes private recreational amenities (such as a playground, an observation deck, and a walking/biking trail) for residents that would somewhat reduce project-generated demand on existing public parks and recreational facilities.

The proposed project would add approximately 212 new residents to the City population. The project developer would be required to pay the standard City Recreation & Parks Facilities fee for new development. Currently, the 1-2-bedroom dwelling unit fee is $1,500.00 per bedroom and the 3-bedroom dwelling unit fee is $1,667.00 per bedroom (City of Watsonville 2019 6a).

Given existing local recreational facilities, along with the new recreational facilities to be provided by the proposed project, the project is not anticipated to trigger the construction of new or physically alter existing recreational facilities that could result in environmental impacts. Impacts would be less than significant.

b. Less than Significant Impact. The proposed project would result in population growth that would incrementally affect other public services such as libraries, public transit, public meeting places, community centers, and the downtown areas of the City. In the past several years, the City has secured increased library funding and expanded physical library facilities to accommodate increased demand and a growing population. The library closest to the project site is the Watsonville Public Library located at 275 Main Street Suite 100. The Watsonville Public Library is the main and largest of the City's library facilities at 42,000 square feet. The library would experience a small increase in public use generated by the project, but not to a degree to which new or expanded library facilities would be required. The overall increase in demand would not require the construction of new or physical alteration of public facilities that could result in environmental impacts.

The addition of 212 (or less) City residents generated by the project would not be significant enough to warrant new or physically altered public transit (discussed in more detail in section 6.17 Transportation), public meeting places, community centers, or City downtown areas. Impacts would be less than significant.

References:

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6.16 Recreation

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			✓	

Conclusion: Regarding recreation, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. The proposed project includes an increase in residential units that would result in increased population growth, with the new residents incrementally increasing use of surrounding public recreation facilities. According to Section 6.14, Population and Housing, the project is projected to increase the population of the City by 212 residents. While the project includes several on-site recreational amenities (including a playground, an observation deck and a walking/biking trail), residents can be anticipated to use local and regional park facilities.

The City offers 143 acres of park land in the form of 26 parks open to the community:

- Pinto Lake (78 acres)
- Ramsay Park (25.91 acres)
- Arista Park (0.27 acres)
- Atri Park (0.32 acres)
- Brentwood park (0.41 acres)
- Bronte Park (0.28 acres)
- Callaghan Park (2.64 acres)
- Cherry Blossom Park (0.15 acres)
- City Plaza Park (1.4 acres)
- Crestview Park (2.01 acres)
- Emmett Court (0.15 acres)
- Flodberg Park (1.07 acres)
- Franich Park (14.02 acres)
- Hazelwood Park (1.07 acres)
- Hope Drive Park (2.46 acres)
- Joyce-Mckenzie Park (1.72 acres)
- Kearney Park (0.29 acres)
- Las Brisas Park (1.00 acres)
- Marinovich Park (1.03 acres)
- Memorial Park (0.22 acres)
- Muzzio Park (1.12 acres0
- Peace Drive Park (1.4 acres)
- River Park (1.43 acres)
- Riverside Mini Park (0.34 acres)
- Seaview Ranch Park (14 acres)
- Victorian Park (0.13 acres)

The closest parks to the project site are Callaghan Park (2.64 acres) and Flodberg Park (1.07 acres), which are located 1,60 feet south and 1,200 feet west, respectively, of the project site.

City residents also have the opportunity to access many state and county park facilities within a 20-minuite drive. These recreational opportunities include:

- Nisene Marks State Park,
- New Brighton and Sunset State Beach and Campground,
- Manresa, Seacliff, Zmudowski, Moss Landing, and Salinas River State Beaches,
- Pinto Lake County Park,
- Santa Cruz County Fair Grounds,
- Mount Madonna County Park, and
- Bike trails along the Pajaro River.

The children's playground provided by the project would reduce the need for use of off-site recreational facilities; however, it is anticipated that a minor increase in the use of off-site recreational facilities by residents of the project would occur. Additionally, the City's 2005 General Plan, although generally not providing specific locations, discusses future potential park acquisitions to provide parks in neighborhoods experiencing population expansion including locating neighborhood park facilities within one-half mile of all residential areas.

Although there is likely to be an increase in park use with the increased population in the planning area, the project would not increase the use such that substantial physical deterioration of the facility would occur or be accelerated. The project would generate property taxes that would go into the City's General Fund to help finance park maintenance and future park production. Implementation of the proposed project would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities, and the impact would be less than significant.

b. Less than Significant Impact. The proposed project includes on-site recreational amenities including a playground area, an observation deck and a walking/biking trail. The proposed project does not include off-site recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. As such, the impact would be less than significant.

References:

City of Watsonville, 2005. General Plan: Recreation Element. Available at: https://www.cityofwatsonville.org/160/2005-General-Plan (accessed October 6, 2019).

City of Watsonville, 2019. Watsonville Parks & Community Services. Available at: https://www.cityofwatsonville.org/1207/City-Parks (accessed October 8, 2019).

6.17 Transportation

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		✓		
b) Conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision(b)?				✓
c) Substantially increase hazards due to a geometric design feature (e,g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?		✓		
d) Result in inadequate emergency access?			✓	

Conclusion: Regarding transportation, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant with Mitigation Incorporated. Construction and operation of the proposed project may potentially affect the circulation system if a project-related increase in vehicle (both passenger and non-passenger) trips or proposed components decrease in the Level of Service (LOS) on existing streets. The project would also have an impact if proposed improvements reduce the availability or efficiency of facilities providing alternative transportation, including bus systems, bicycle routes, and pedestrian walkways.

Kimley Horn prepared a Traffic Impact Study (TIS) for the proposed project in May 2019. The TIS analyses potential traffic impacts of the project. This section summarizes and assesses the calculations made and the conclusions reached in the TIS (Appendix I).

The TIS evaluated potential project-related impacts at four intersections in the vicinity of the project site. The four intersections were chosen through analysis of existing access routes to the site and collaboration with City staff. The intersections include:

- Freedom Boulevard & Miles Lane (unsignalized)
- Santa Clara Street/Kimberly Lane & Miles Lane (unsignalized)
- Santa Clara Street & Marin Street (unsignalized)
- Auto Center Drive & Marin Street (unsignalized)

LOS is divided into six categories, LOS A through F. As shown in Table 14, LOS A represents the best operating conditions with few delays (in seconds) and LOS F represents the worst operation conditions with long delays and high levels of congestion. Thresholds for determining LOS are different for signalized and unsignalized intersections (Transportation Research Board 2000).

Table 15. Intersection Level of Service Definitions

Level of Service	Description	Signalized (Avg. control delay per vehicles-sec/veh)	Unsignalized (Avg. control delay per vehicles-sec/veh)
A	Free flow with no delays. Users are virtually Unaffected by others in the traffic stream	< 10	≤ 10
B	Stable traffic. Traffic flows smoothly with few delays.	> 10 – 20	> 10 – 15
C	Stable flow but the operation of individual users Becomes affected by other vehicles. Modest delays.	> 20 – 35	> 15 – 25
D	Approaching unstable flow. Operation of individual Users becomes significantly affected by other Vehicles. Delays may be more than one cycle during Peak hours.	> 35 – 55	> 25 – 35
E	Unstable flow with operating conditions at or near the Capacity level. Long delays and vehicle queuing.	> 55 – 80	> 35 – 50
F	Forced or breakdown flow that causes reduced Capacity. Stop and go traffic conditions. Excessive Long delays and vehicle queuing.	> 80	> 50

Source: Transportation Research Board, *Highway Capacity Manual 2010*, National Research Council, Washington DC, 2000.

The significance threshold established in the City's General Plan is LOS D. The City's current policy is for all intersections to operate without significant delays (i.e., better than LOS D). For unsignalized intersections such as the study intersections, average delays of over 35 seconds result in a LOS E or LOS F assignment (see Table 14). Intersections and roadways operating at LOS D have some congestion and limited driver maneuverability. Intersections and roadways that operate below LOS D would need improvements to better the flow of traffic. This LOS standard is not applicable at unsignalized intersections where peak hour operations may perform below LOS D and a traffic signal is not warranted.

The study intersections were observed during two weekday two-hour periods on December 18, 2018, when schools in the area were in session (i.e., traffic counts were taken between 7:00 – 9:00 AM and 4:00 – 6:00 PM). Peak AM and PM trip hours at all four study intersections occurred during these observation hours. As shown in Table 15, all studied intersections operated at LOS B or better during the AM and PM peak hours.

The TIS evaluated the potential impacts of the project on the four study intersections. The TIS considered net new traffic added to the roadway circulation system in the area. This means the trips produced through occupancy and use of the existing dwelling units and rehabilitation facility at the

project site were subtracted from the projected gross trips of the project to produce the net peak hour and daily trip generation counts the project would generate. The project would produce a net increase of 27 AM peak hour trips, 38 PM peak hour trips, and 334 daily trips. Table 15 (Table 2 of the TIS) shows Existing Conditions Level of Service, while Table 16 (Table 4 of the TIS) shows calculated Existing Plus Project Levels of Service. None of the four study intersections would experience a change in LOS as a result of the project.

Table 16. Existing Conditions Level of Service (Table 2 of TIS)

#	Intersection	LOS Standard	Control Type	Existing Conditions					
				AM Peak Hour			PM Peak Hour		
				Movement	Delay	LOS	Movement	Delay	LOS
1	Freedom Boulevard & Miles Lane	D	SSSC	Overall	2.4	A	Overall	3.1	A
			Worst Approach	EB	11.0	B	EB	12.2	B
2	Santa Clara Street & Miles Lane	D	AWSC	Overall	7.1	A	Overall	7.3	A
3	Santa Clara Street & Marin Street	D	AWSC	Overall	10.7	B	Overall	9.2	A
4	Auto Center Drive & Marin Street	D	SSSC	Overall	6.2	A	Overall	3.9	A
			Worst Approach	WB	22.8	C	WB	16.9	C

Notes:

1. Analysis performed using HCM 2010 methodologies.
2. Delay indicated in seconds/vehicle.
3. Overall level of service (LOS) standard for the City is D.
4. Intersections that fall below City standard are shown in **bold.**

Additional analyses presented in the TIS are summarized as follows:

- The four proposed driveways would generate relatively low volumes of new traffic. Thus, driveway operations were evaluated qualitatively instead of quantitatively. Driveway operations would not feasibly create a significant impact on roadways near the project site.

- A site distance analysis was conducted at the Auto Center Drive and Marin Street intersection, which provides access to and from the site via Main Street to the south. Stopping site distance at the intersection was determined to be substandard per American Association of State Highway Transportation Officials (AASHTO) standards. The project may exacerbate already hazardous driving conditions at the intersection by increasing the number of vehicles using the intersection. Mitigation to improve intersection design shall be required.

Near Term (2021) plus Project Conditions
The TIS used the year 2021 as the target year in analyzing project impacts on traffic control in the neighborhood in the near term (three years). Analysis involved assessing the trips generated by the proposed project in relation to projected near term growth in the City of Watsonville.

The TIS referenced two sources, the Sunshine Vista Phased Development Project Traffic Impact Analysis (January 2017) and the Association of Monterey Bay Area Governments (AMBAG) 2040 model, to produce near term volumes of traffic in the project vicinity. The Sunshine Vista Project, located approximately one mile south of the project site, is the only ongoing, large-scale residential development project in the area. The Sunshine Vista TIS was used to determine if trips generated by the Sunshine Vista Project would affect the study intersections. It was determined that none of the Sunshine Vista Project trips would be assigned to the four study intersections.

The AMBAG model was utilized to determine annual traffic growth rates for the neighborhood and for Freedom Boulevard and then develop near term vehicle trip volumes. The neighborhood annual growth rate calculated was 0.35% and the Freedom Boulevard annual growth rate calculated was 0.93%. The TIS used project trip generation in conjunction with the annual growth rates to evaluate traffic conditions at the study intersections in the near term. The TIS concluded that all study intersections would operate at LOS D or better for the AM and PM peak hours under near term plus project conditions. Thus, no mitigations are necessary under near term conditions.

Cumulative (2040) plus Project Conditions
The TIS utilized the Major Street Master Plan (MSMP), which indicates anticipated improvements to the City of Watsonville roadway network, and the AMBAG model to create a cumulative traffic condition to which project trips would be added. The AMBAG models incorporate growth projections from the now rescinded 2030 General Plan; although the plan has been rescinded, the AMBAG calculations still provide the most recent and best estimates of population growth in the Monterey Bay region. Cumulative traffic conditions were determined by first developing annual growth rates in traffic volumes for neighborhood streets (Auto Center Drive, Arthur Road, Miles Lane, Santa Clara Street, and Marin Street) and for Freedom Boulevard. The growth rates for cumulative conditions were the same as those developed for near term conditions, 0.35% and 0.93% respectively. The annual growth rates were added to existing traffic volumes to produce cumulative conditions.

The cumulative impact assessment compared the study intersections without and with the proposed project vehicle trips. Cumulative conditions at the study intersections without the project would impact (worsen) LOS during the AM and PM peak hours at several of the study intersections, but no LOS would fall to levels LOS E or LOS F. The Auto Center Drive and Marin Street intersection would operate at LOS D. Cumulative conditions plus project trips at the study intersections would not change the projected LOS during the AM or PM peak hours; therefore, no LOS would fall below LOS D.

Despite not being cumulatively considerable, the applicant shall be required to pay the mandatory citywide traffic impact fees, or "fair share fees," at the time of building permit issuance. These fees are mandatory regardless of whether a project is found to have a significant traffic impact. The citywide traffic impact fees are used to fund traffic improvements identified in the City's General Plan or Major Streets Master Plan. The current citywide impact fees for FY2019-20 are $199 per daily vehicle trip (for multifamily development) and $151 per daily vehicle trip (for non-residential development).

Alternative Transportation
The project would not conflict with public transit, bicycle or pedestrian facilities. There is one bus stop located 800 feet from the project site to the south of the intersection of Freedom Boulevard and Miles Lane. The project is estimated to produce only one AM peak hour bus trip and one PM peak hour bus trip; it would not significantly increase demand at, and subsequently affect the use or performance of, the bus stop. In addition, the project does not propose to alter lane configurations of surrounding roads, meaning bus routes would not be affected.

There are several bike facilities (including Class I, II, and III facilities) located within 0.5-mile of the project site. Because the project would not alter lane configurations and because small numbers of people are anticipated to bike to and from the project site, bike facilities in the area would not be significantly impacted.

The project would slightly alter the existing condition of sidewalk facilities in the vicinity through the creation of four new driveways, but this change would not impact the performance or safety of the sidewalks. Pedestrian travel may be slightly disrupted during project construction. Temporary construction impacts on the circulation system constitute a less than significant impact as the project shall be required to follow standard City guidelines for limiting the impacts of construction activities.

The proposed project would largely have less than significant impacts on the circulation system and would not conflict with a program, plan, ordinance or policy addressing the circulation system. Project-related increase in vehicle trips would not lower the LOS at the study intersections to LOS E or F. Transit, roadway, bicycle and pedestrian facilities would not be significantly affected. However, the project may have a significant impact on the operation of Auto Center Drive and Marin Street Intersection, which in its existing condition is hazardous for drivers. Though the project would not lower LOS below LOS D at this intersection, the increase in traffic contributed by the project may exacerbate already hazardous driving conditions. **Mitigation Measure TRANS-1** below would reduce impacts to less than significant levels.

Mitigation Measure TRANS-1: Existing Plus Project Impacts on the Auto Center Drive & Marin Street Intersection. To improve driving conditions at the Auto Center Drive & Marin Street intersection, the City shall require the following improvements:

Auto Center Drive South of Marin Street

a) Provide approximately 280 feet of Striping Detail 22 (Centerline).
b) Provide approximately 350 feet of Striping Detail 27B (Right Edgeline) and create a painted bulb-out for vehicles entering from Auto Center Drive. Within the painted bulb-out, add 6" diagonal white striping with 15' spacing. The right edgeline striping would move the center of the road away from the curb allowing for better visibility.
c) Provide "Intersection Ahead" signage (W1-10e) with "Speed Sign" (W13-1P) with 20 mph speed and a custom "Limited Sight Distance" sign. Place at point of curvature for Northbound approach according to MUCTD Table 2C-4. This sign would warn drivers of the approaching intersection to be aware of cross traffic and to reduce speed.

Marin Street

a) Move the 12-inch stop bar closer to the curb line along with new "STOP" markings. This will allow drivers to pull up further into the new 8-foot parking lane to increase visibility along Auto Center Drive.

b) Provide approximately 75 feet of Striping Detail 22 (Centerline) to shift the westbound intersection approach to the north. This would allow for more visibility on the Auto Center Drive northbound approach.
c) Extend red curb on the south curb approximately 85 feet. This red curb would remove approximately three on-street parking spaces. This would prevent drivers from parking in the painted bulb-out.
d) Extend red curb on the north curb approximately 30 feet. This red curb would remove approximately one on-street parking space to allow more space for drivers to approach the intersection.

Auto Center Drive North of Marin Street

a) Extend red curb approximately 120 feet on the east curb and provide "No Parking Anytime" signage. This would remove approximately five (5) on-street parking spaces. Red curb would make parking illegal along the eastern curb allowing southbound sight distance to be unobstructed.
b) Provide "Intersection Ahead" signage (W1-10e) with "Speed Sign" (W13-1P) with 20 mph speed and a custom "Limited Sight Distance" sign. Place at point of curvature for southbound approach according to MUCTD Table 2C-4. This sign would warn drivers of the approaching intersection to be aware of cross traffic and to reduce speed.
c) Provide speed feedback sign similar to existing signage on east side of Auto Center Drive. Place at point of curvature for southbound approach according to MUCTD Table 2C-4.
d) Provide approximately 200 feet of Striping Detail 22 (Centerline) and Striping Detail 27B (Right Edgeline) for the Northbound approach. Right edgeline striping would be 8-feet from the curb. This striping would reduce confusion for vehicles traveling northbound.
e) Provide approximately 490 feet of Striping Detail 27B (Right Edgeline) for the Southbound approach. This striping would move the center of the road away from the curb allowing for better visibility.

With this mitigation measure, intersection design would meet AASHTO standards, and the Existing Plus Project impact on driver safety at the intersection would be reduced to a less-than-significant level.

b. Less than Significant Impact. Per CEQA Guidelines section 15064.3(c) (Applicability), the provisions of section 15064.3 do not apply statewide until July 1, 2020. The City does not have a VMT management plan nor a congestion management plan. See Section 6.17.a above for a discussion of project impacts on traffic.

c. Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if the proposed project considerably increased hazards due to a design feature or introduced incompatible uses to the existing circulation system. Indirect access to the project site would be provided via the four study intersections discussed above in Section 17.a. The Auto Center Drive and Marin Street intersection is considered a hazardous intersection because of its inadequate design. Stopping sight distances at the intersection do not meet AASHTO standards. Because the project applicant would be required to pay a fair share fee to implement mitigation measures to improve the intersection, the project would decrease, not increase, hazards related to the design of the intersection. Direct access to the project site would be provided via four new driveways. The design of the driveways would comply will all applicable City regulations, including sight distances, line-

of-sight triangles, and curb design. Therefore, project driveways would not increase hazards in the area.

Construction activities may create temporary hazardous conditions for pedestrians, bikers, and drivers. Construction-related impacts would cease upon project completion. **Mitigation Measure TRANS-2** below would reduce impacts of temporary construction activities to less than significant levels.

Mitigation Measure TRANS-2: Construction Period Transportation Impacts. The Applicant shall submit a Construction Period Traffic Control Plan to the City for review and approval. The plan shall include traffic safety guidelines compatible with section 12 of the Caltrans Standard Specifications ("Construction Area Traffic Control Devices") to be followed during construction. The plan shall also specify provision of adequate signing and other precautions for public safety to be provided during project construction. In particular, the plan shall include a discussion of bicycle and pedestrian safety needs due to project construction and later, project operation. In addition, the plan shall address emergency vehicle access during construction. The applicant or their general contractor for the project shall notify the Public Works & Utilities Department and local emergency services (i.e., the Police and Fire Departments) prior to construction to inform them of the proposed construction schedule and that traffic delays may occur.

Prior to approval of a grading permit, the City shall review and approve the project Construction Period Traffic Control Plan. During construction, the City shall periodically verify that traffic control plan provisions are being implemented.

d. Less than Significant Impact. A significant impact would occur if the proposed project would not satisfy emergency design and access requirements of the City of Watsonville Fire Department or otherwise inhibit the ability of emergency vehicles to serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access because all access features are subject to and must satisfy City of Watsonville design requirements, including Fire Department requirements, prior to project approval. Therefore, the proposed project would result in less than significant impacts related to emergency access.

References:

California Natural Resources Agency, 2018. Amendments and Additions to the State CEQA Guidelines, Final Adopted Text. Available at: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf (accessed on October 8, 2019).

Caltrans, 2019. Construction Manual, Chapter 12 Temporary Traffic Control. Available at: https://dot.ca.gov/-/media/dot-media/programs/construction/documents/policies-procedures-publications/construction-manual/sec4-12.pdf (accessed on October 8, 2019).

Horn, K., 2019. Miles Lane Development Traffic Impact Study. Miles Lane Housing Project application materials on file at and made available upon request to the City of Watsonville Community Development Department. Watsonville, CA,

Transportation Research Board, 2000. *Highway Capacity Manual 2010*. National Research Council, Washington DC.

6.18 Tribal Cultural Resources

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource define in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		✓		
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register or historical resources as defined in Public Resources Code section 6020.1(k), or		✓		
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		✓		

Conclusion: Regarding tribal cultural resources, the proposed project would not result in any significant environmental impacts.

Documentation:

a.i, and a.ii Less Than Significant with Mitigation Incorporated. The cultural resources records search results conducted by the NWIC indicate that there are no Tribal Cultural Resources (TCR) or archaeological resources relating to TCRs located within the project's boundaries. The nearest archaeological site (P19-000396: shell midden) is located within a one half-mile radius of the project site and will not be impacted by the proposed project, as the resource is located outside of the project boundary (Northwest Information Center 2019). Additionally, a Sacred Lands File Search through the Native American Heritage Commission (NAHC), Native American Scoping (MIG), and an archaeological pedestrian field survey, all failed to indicate TCR's or archaeological (prehistoric and historic) resources relating to TCRs within the project site. Therefore, the proposed project would result in no substantial adverse change in the significance of TCRs as defined in CEQA Guidelines section15064.5.

Nevertheless, despite the heavy disturbances to portions of the project site, it is possible to encounter buried archaeological resources relating to TCR's given the proven prehistoric occupation of Santa Cruz County and the favorable natural conditions (e.g., ephemeral drainages, natural spring, and vegetation communities) that would have attracted prehistoric inhabitants to the area. As a result, in the event of the unanticipated discovery of cultural resources relating to TCRs during earthmoving operations, the

following mitigation measures are recommended to reduce potentially significant impacts to TCR's or related archaeological resources that are accidentally discovered during implementation of the proposed project to a less than significant level.

Application of **Mitigation Measures CUL-1** through **CUL-4** would result in less than significant impacts with respect to tribal cultural resources.

References:

MIG, Inc., 2019. Native American Scoping Letters sent to the six tribes as recommended by the NAHC's, Prepared by Chris Purtell. MIG, Inc., Riverside Office.

Native American Heritage Commission, 2019. Sacred Lands File Search Prepared in Support of the Miles Affordable Housing Project, Prepared by the Native American Heritage Commission via Ms. G. Totton, Addressed to Chris Purtell of MIG, Inc. Sacramento, California 95691.

Northwest Information Center, 2019. Cultural Resources Records Search in Support of the Miles Lane Affordable Housing Project (No. File No. 18-2323), Prepared by the Northwest Information Center, Addressed to Chris Purtell of MIG, Inc. Sonoma, California.

6.19 Utilities and Service Systems

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project area that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Conclusion: Regarding utilities and service systems, the proposed project would not result in any significant environmental impacts.

Documentation:

a. Less than Significant Impact. As described further below, the proposed project would not result in the relocation or construction of new or expanded water supply, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities that would cause a significant environmental effect.

Water

The City owns, operates, and maintains 190 miles of water supply pipelines and, as of 2015, has 14,782 public water connections (Watsonville UWMP 2016). The project would connect to three existing water mains, one of which is located underneath Santa Clara Street and the other two under Miles Lane. Construction of new water supply infrastructure would be required. Construction of water supply infrastructure would be required to be standard for new residential development. Prior to issuance of building permits, the developer would be required to provide the City with a detailed study indicating specifications of the new water infrastructure and any minor modifications needed to the existing municipal conveyance system to accommodate proposed project needs. Construction of new water supply infrastructure would be conducted in compliance with the City's Public Improvement Standards and City-approved utilities construction best management practices.

Construction would not likely cause significant environmental effects. No new public water supply facilities would be needed to serve the proposed project. Impacts would be less than significant.

Wastewater

The City owns, operates, and maintains a sanitary sewer system of approximately 170 miles of pipelines that collect and transfer wastewater to the City's Wastewater Treatment Facility (WWTF). According to the 2015 UWMP, the WWTF is permitted to treat a maximum of 12 million gallons per day and, on average, treats 6 to 7 million gallons of wastewater per day from the City of Watsonville, Pajaro, Freedom, and Salsipuedes sanitary districts (Watsonville UWMP).

The project would connect to existing public sanitary sewer mains under Miles Lane, under Santa Clara Street, and located centrally on the project site. Completion of the proposed project would require new wastewater infrastructure to convey wastewater from the project's domestic facilities to existing City sewer mains. Construction of wastewater infrastructure is expected to be standard for new mixed-use development. Prior to issuance of project building permits, the developer would be required to provide the City with a detailed study indicating specifications of the new wastewater infrastructure and any minor modifications needed to the existing municipal conveyance system to accommodate project-generated wastewater.[5]

Anticipated project wastewater generation was calculated using a conservative industry standard in which wastewater generated equals 95 percent of water use. See section 6.19 b. below for projected project water demand; the project is expected to use 7,044,897.4 gallons, or 21.62 AF, of water per year. As a result, the project would produce approximately 6,692,978 gallons (20.54 AF) of wastewater per year.[6] This equates to 18,337 gallons of wastewater (0.06 AF) generated per day. At 18,337 gallons of wastewater per day, the project would contribute an additional 0.03 percent of the WWTF's daily wastewater intake. The WWTF would have adequate capacity to treat project wastewater in addition to its existing commitments.

No new public wastewater conveyance or treatment facilities would be needed to serve the proposed project. Construction impacts would be less than significant.

Stormwater

Though the project site is developed with seven homes, paved parking lots, and paved driveways, most of the site is currently undeveloped and pervious. The proposed project would generate stormwater runoff from new impervious surfaces. Stormwater retention would be accomplished through a combination of underground infiltration and above-ground retention. Runoff would be diverted by drainage channels into five drainage management areas (DMAs). All runoff would be routed through media filters for water quality and then to underground infiltration facilities for

[5] According to Principal Engineer David Caneer, the Wastewater Collections Division in the Public Works and Utilities (PW&U) Department reports that the operation of the City's sewer pump station located at 140 Miles Lane is problematic and they believe improvements are needed to insure reliable operation of the pump station. Residential properties, mostly attached housing located at Marin and Miles east of the creek flow to the station. Counting addresses reveals 71 residential units including two commercial properties which account for ten equivalent residential units on Marin Street and 42 residential units on Miles that flow to the station. Of these, 16 of the units are Marin Street Townhomes, a market rate for sale housing project which is under construction, and 18 equivalent two-bedroom units from the proposed MidPen Miles Lane affordable housing project flow to the station. Based on units, the Miles Lane Project accounts for approximately 16 percent of the flow. The PW&U Department has commissioned a Sewer Master Plan and it will include a capacity and demand evaluation of the pump station. A plan for improvements will be prepared as needed to correct problems and deficiencies at the pump station. As such, a project condition of approval would require the applicant to pay its fair share contribution to fund improvements to the sewer pump station. Fair share shall be based on contributory flow which is approximately 16 percent of the total and the engineer's estimated cost of improvements to the existing pump station.

[6] Calculation: 7,044,897.4 gallons water use x 0.95 = 6,692,978 gallons wastewater.

quantity. One DMA would send runoff to Miles Lane by overflow. All runoff would eventually be diverted into the stream located centrally and running north to south on the project site (C3 Engineering). Refer to section 6.10, Hydrology and Water Quality, of this Initial Study for a detailed discussion of project stormwater infrastructure and runoff treatment.

The project's Preliminary Stormwater Control Plan was created and designed in accordance with the Stormwater Post-Construction Standards incorporated into the City of Watsonville Public Improvement Standards through passage of Resolution No. 4-14. Stormwater runoff would be treated to City standards before being diverted into the stream on-site. Construction of the stormwater improvements discussed above is not expected to cause significant environmental effects. Construction would be conducted in compliance with the City Public Works & Utilities Department Engineering Division's prescribed best management practices for utilities infrastructure improvements.

No new public stormwater drainage facilities would be needed to serve the proposed project. Impacts would be less than significant.

Electric Power

The proposed project would generate demand for electric power. The project would connect to and be served by existing electricity infrastructure owned and operated by PG&E. The City is located within PG&E's Service Area. Multiple PG&E transmission poles and power lines are located adjacent to the project site running parallel to Miles Lane. The process of connecting the project to existing infrastructure is expected to be standard for conveying electrical power to a mixed-use development. Construction would be conducted in compliance with City-approved best management practices for utilities infrastructure improvements. No new electric power facilities would be needed to serve the project. Impacts would be less than significant.

Natural Gas

The proposed project would generate demand for natural gas. The project would connect to and be served by existing natural gas infrastructure owned and operated by PG&E. Several PG&E natural gas pipelines run through the City to the west of the project site (PG&E Pipe Locator). Though no new natural gas facilities would be needed to serve the proposed project, natural gas improvements would be required to connect project components to existing natural gas pipelines. The process of connecting the project to existing infrastructure is expected to be standard for conveying natural gas to a mixed-use development. Construction would be conducted in compliance with City-approved best management practices for utilities infrastructure improvements. No new natural gas facilities would be needed to serve the project. Impacts would be less than significant.

Telecommunications

The proposed project would connect to existing telecommunications infrastructure. A telecommunications provider for the project has not yet been selected. Telecommunications infrastructure is often grouped with electric power infrastructure on utility poles and transmission towers; therefore, it can be reasonably assumed the project would connect to telecommunications infrastructure on existing PG&E utility poles. The process of connecting the project to existing infrastructure is expected to be standard for transmitting Internet and other telecommunications services to a mixed-use development. Construction would be conducted in compliance with City-approved best management practices for utilities infrastructure improvements. No new telecommunications facilities would be needed to serve the project. Connection to existing

telecommunications infrastructure would not likely cause significant environmental effects. Impacts would be less than significant.

In summary, the project would not require or result in the relocation or construction of new public or private utilities and service facilities. However, project completion would require infrastructure improvements to connect project components to existing public and private utilities infrastructure. City standards include undergrounding all new connections to overhead facilities, including electric, telephone and television lines. Construction of new or expanded utilities infrastructure would comply with City standards, and impacts would be less than significant.

b. Less than Significant Impact. The City of Watsonville's primary source of potable water is groundwater from the Pajaro Valley Groundwater Basin. The City's water supply and distribution system is composed of nine hydraulic pressure zones, fourteen groundwater wells, eight reservoirs and water storage facilities, nine booster stations, 190 miles of pipelines, and the Corralitos Filter Plant (CFP), a slow sand filtration plant. The City's Water Service Area (WSA) includes the City limits and several unincorporated areas of Santa Cruz County. Potable water is provided to the service population by the City of Watsonville Public Works & Utilities Department. The City works cooperatively with the Pajaro Valley Water Management Agency (PVWMA), the administrative boundaries of which overlay the City's WSA (Watsonville UWMP 2016).

According to the City's 2015 UWMP, the City supplied approximately 6,870-acre feet (AF) of potable water to 65,966 customers in 2016. The City projects potable water demand will increase to 7,934 AF in 2020, 8,132 AF in 2025, 8,340 AF in 2030, and 8,560 AF in 2035. The City's WSA population is expected to rise to 68,957 in 2020, 72,093 in 2025, 75,382 in 2030, and 78,833 in 2035. In 2015, the City consumed 81 gallons per capita per day (GCPD); the UWMP sets a 2020 goal to limit per-capita consumption to 117 GPCD.

The project would generate residential use water demand for 212 people (195 residents of the proposed affordable housing component and an average of 17 residential treatment program clients per night). The applicant has not provided estimated project residential water demand. The estimated water demand for 61 residential units, using CalEEMod's water use rates for the "apartment" land use sub type, is 6,479,969 gallons (or 19.9 AF) of water per year (indoor + outdoor use).[7] While this value does not include the water use demand of the 17 residents of the proposed residential treatment facility, this number is calculated using the 2015 UWMP per-capita consumption of 81 GPCD. This would result in approximately 1,052 gallons of water per day, or 1.2 acre-feet of water annually.[8] Overall, these two approaches to measuring water use result an estimated use of 21.1 AF annually.

Potable water would also be supplied for outpatient facility operations. CalEEMod water use rates for hospitals were used to calculated outpatient facility water use. CalEEMod provides water use rates for every 1,000 square feet of hospital land use (CalEEMod). As a result, it is anticipated the 3,765 square foot facility would generate demand for 562,423 gallons per year, or 1.7 AF per year.[9]

[7] Calculation: [61 units x 65,154 (gal/size/year for one apartment dwelling unit – indoor water use)] + [61 units x 41,075 (gal/size/year for one apartment dwelling unit – outdoor water use)] = 3,974,394 gallons per year + 2,505,575 gallons per year = 6,479, 969 gallons per year = 19.89 AF per year.

[8] Calculation: 81 GPCD x 13 residents = 1,052 gallons per day x 365 = 384,345 gallons per year = 27.78 AF annually.

[9] Calculation: [3.765 x 125,481 gallons (gal/size/year for 1,000 SF – indoor use)] + 3.765 x 23,901 gallons (gal/size/year for 1,000 SF – outdoor use)] = 472,435.97 gallons/year + 89,987.27 gallons/year = 562,423 gallons/year = 1.73 AF per year.

Overall, project water consumption is expected to be approximately 23AF per year (21.1 AF for residential use + 1.7 AF for outpatient facility use). This value does not account for the water use demand that would be generated by the 17 residential treatment program residents. Additionally, the 2015 UWMP concludes the City will continue to be able to provide water to customers in normal, dry, and multiple dry years.

Considering existing and future projected groundwater supplies and City groundwater consumption, the City has adequate water supplies to serve the proposed project. No new water supply source or entitlements would be necessary, and impacts would be less than significant.

c. Less than Significant Impact. See wastewater discussion in section 17.a above.

d. Less than Significant Impact. According to CalRecycle's Disposal Reporting System (DRS), the City produced 42,533 tons of disposed solid waste in 2018; this equates to an average of 4.3 pounds per person per day, or 1,575 pounds per person per year. According to the DRS, waste generated in the City was sent to the Monterey Peninsula Landfill (25,745 tons), the City of Watsonville Landfill (12,109 tons), the Buena Vista Drive Sanitary Landfill (2,457 tons), the Fink Road Landfill (1,074 tons), the Kirby Canyon Recycling and Disposal Facility (596 tons), the Johnson Canyon Sanitary Landfill (434 tons), Altamont Landfill & Resource Recovery (65 tons), the John Smith Road Landfill (24 tons), the Portero Hills Landfill (16 tons), the Guadalupe Sanitary Landfill (7 tons), Recology Hay Road (3 tons), and the Newby Island Sanitary Landfill (2 tons). Given the regional nature of the City's distribution of solid waste, a multi-facility estimate of landfill capacity is used. Four of the landfills listed above accepted 97.3 percent (41,385 tons) of the City's solid waste in 2018. Therefore, Monterey Peninsula Landfill, the City of Watsonville Landfill, the Buena Vista Sanitary Landfill, and the Fink Road Landfill were chosen for analysis of remaining landfill capacity relative to the proposed project's estimated solid waste generation rate.

According to CalRecycle, Monterey Peninsula Landfill, as of 2004, had remaining capacity for 48,560,000 cubic yards and is permitted to intake a maximum of 3,500 tons of solid waste per day. The City of Watsonville Landfill, as of 2018, had remaining capacity for 1,417,561 cubic yards of waste and can intake 275 tons of solid waste per day. The Buena Vista Drive Sanitary Landfill, as of 2018, had remaining capacity for 2,206,541 cubic yards of waste and is permitted to intake 838 tons per day. The Fink Road Landfill, as of 2017, had a remaining capacity of 7,184,701 cubic yards and can intake 2,400 tons per day (CalRecycle SWIS).

The proposed project would house 212 residents. Assuming the per capita per year rate of 1,575 pounds, the project would generate approximately 333,900 pounds (167 tons) of solid waste annually through residential uses. The proposed project also includes a 3,765 SF outpatient medical facility. CalRecycle provides estimated solid waste generation rates for various waste generation sources. CalRecycle does not provide an estimated generation rate for an outpatient facility; therefore, the rate for the professional office source type was used to assess outpatient facility waste production (CalRecycle Waste Generation Rates). At a rate of 0.084 lb/sq ft/day for a 3,765 square foot facility, the outpatient facility would produce approximately 316.26 pounds of solid waste per day. This equates to 115,435 pounds, or 57.72 tons, or solid waste generated per year. In total, the project is expected to produce approximately 224.72 tons, or 449,440 pounds, of solid waste per year after build-out.

If project solid waste were to be diverted to only the four study landfills at a rate of 0.62 tons/day (224.72 tons/365 days = 0.62 tons/day), the project would increase daily landfill throughput to each of the four study landfills by 0.02 percent, 0.23 percent, 0.07 percent, and 0.03 percent, respectively. In addition, because some project solid waste may be diverted to any of the remaining eight solid waste disposal facilities listed above, these percentages would most likely be even less. Because the project would produce relatively small quantities of solid waste annually, the landfills discussed above, at their current maximum permitted capacity and daily throughput, would have capacity to receive and dispose of project solid waste.

The proposed project would not result in a substantial increase in solid waste generation nor generate solid waste in excess of the capacity of local infrastructure; therefore, impacts would be less than significant.

e. Less than Significant Impact. The primary State legislation regarding solid waste is AB939, the Integrated Waste Management Act, adopted in 1989. AB939 requires local jurisdictions to achieve a minimum 50 percent solid waste diversion rate. A minimum 50 percent diversion rate for construction demolition and debris is also required. Recently, AB341, adopted in 2011, requires mandatory commercial recycling programs.

The proposed project is a mixed-use development including residential and medical (drug rehabilitation and outpatient services) uses. The residential portion of the project would not include any component that would conflict with State laws governing construction or operational solid waste diversion. The proposed project would comply with local implementation requirements.

Operation of the drug treatment and outpatient medical facilities may produce solid waste of concern. According to the World Health Organization (WHO), health-care facilities produce mostly general, non-hazardous waste, but also hazardous, infectious, or toxic waste such as used needles and syringes, used swabs and bandages, and expired and unused drugs and vaccines (WHO). The project would be required to comply with standard federal, State, and local guidelines for disposal of medical facility waste, including section 5-48.050 (Safe Disposal of Drugs and Sharps - Disposal of unwanted products) of the Watsonville Municipal Code and applicable sections of the California Health and Safety Code (e.g., sections 117600 - 118360, The Medical Waste Management Act).

The project would include construction and demolition materials disposal and recycling. The City requires all projects that include demolition and/or construction of structures to submit a Construction Waste Management Plan (Watsonville Construction and Demolition Recycling). The diversion requirements for all projects is 65 percent of the materials generated by a Construction and Demolition project. When the project is completed, the applicant must submit quantities of recycled or diverted materials and all weight receipts to the City Community Development Department. With compliance with existing solid waste regulations, impacts would be less than significant.

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6.20 Wildfire

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to scope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			✓	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			✓	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			✓	

Conclusion: Regarding wildfire, the proposed project would not result in any significant environmental impacts.

Documentation:

a. **No Impact.** The proposed project would not impair the emergency response or emergency evacuation plan for the County. The proposed project would not result in a significant change in existing circulation patterns and would have no effect on emergency response routes.

b. **Less than Significant Impact.** The project site is not located within a fire hazard area according to the Fire Hazard Severity Zones map. According to the City's General Plan, a high fire hazard zone occurs in Watsonville west of the project site in a wildland dominated area. The project area is vegetated, however, there is an existing drainage channel that intersects the site and the surrounding land uses are primarily developed residential and commercial. Therefore, the impact would be less than significant.

c. **Less than Significant Impact.** The project site is located in an urban and developed area that is equipped with emergency water sources and power lines that conform with City standards. The proposed project involves the installation of driveway approaches and internal roadways for ingress and egress to and from existing public right-of-ways. The existing transmission lines located along publicly accessible roads would continue to be maintained by PG&E.

The project would include the installation of fire breaks around the new buildings and maintenance of the existing private access roads and parking area in accordance with City ordinance. These project

components themselves would not exacerbate fire risk (fire breaks are installed expressly to prevent the start and spread of fires), but the use of construction equipment for installation, maintenance, and improvements could temporarily increase fire risk on the property. However, compliance with all applicable Code standards, including but not limited to City Construction Grading and Drainage Ordinance and City Fire Safety Ordinance requirements would reduce the effects of temporary impacts to less than significant levels.

d. **Less than Significant.** The project is not located in a high fire severity zone and therefore there is a low likelihood that the project would expose people or structures to significant risks as a result of runoff, post-fire slope instability. The impact would be less than significant

6.21 Mandatory Findings of Significance

	Summary of Impacts			
	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other projects, and the effects of probable future projects.)				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

Conclusion: The proposed project would not result in any significant environmental impacts, as related to mandatory findings of significance.

Documentation:

a. Less than significant with mitigation incorporated. The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in section 6.1, and would not result in excessive light or glare. Potential cumulative impacts to fish and wildlife species along with animal and plant communities are less than significant with the incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and BIO-5.

The project site is not known to have any association with an important example of California's history or prehistory. Adverse impacts to archaeological and paleontological resources would not occur. Construction-phase procedures would be implemented in the event any archaeological or paleontological resources are discovered during grading and excavation, consistent with Mitigation Measure CUL-1, CUL-2, CUL-3, CUL-4, and CUL-5. Implementation of these Mitigation Measures would ensure that impacts related to cultural resources would be less than significant.

b. Less than Significant Impact. Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services,

transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project. The traffic analysis assumes a cumulative annual growth rate ranging from 0.35-0.93%.

Short-term impacts related to noise and pollutant emissions would be at less than significant levels and therefore would not contribute substantially to any other concurrent construction programs that may be occurring in the vicinity. The project's contribution to long-term, cumulative impacts would not be significant. In particular, the project is subject to development impact fees and property taxes to offset project related impacts to public services and utility systems such as fire protection services, traffic control and roadways, storm drain facilities, water and wastewater facilities, and other public facilities and equipment. The impacts would be less than significant.

c. **Less than Significant Impact.** Based on the preceding analysis of potential impacts in the responses to checklist items 6.1 thru 6.30, no evidence is presented that this project would degrade the quality of the environment. For all the foregoing reasons, the City hereby finds that, with implementation of the incorporated Mitigation Measures listed in this IS/MND, there would be no substantial, adverse impacts on human beings, directly, or indirectly, with mitigation incorporated.

References:

None.

7. Lead Agency and Consultants

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