



Freedom Campus Master Plan

Initial Study – Mitigated Negative Declaration

prepared by

County of Santa Cruz
Department of Public Works
701 Ocean Street, Room 410
Santa Cruz, California 95060
Contact: Travis Cary

reviewed by: _____

prepared with the assistance of

Rincon Consultants, Inc.
2511 Garden Road Suite C-250
Monterey, California 93940

September 2022

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RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

rinconconsultants.com

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Table of Contents

Initial Study.....	3
1. Project Title.....	3
2. Lead Agency Name and Contact.....	3
3. Project Location.....	3
4. General Plan Designation and Zoning.....	3
5. Existing and Surrounding Land Uses.....	6
6. Description of Project.....	6
7. Project Related Approvals, Permits, and Agreements.....	9
Environmental Factors Potentially Affected.....	10
Determination.....	11
Environmental Checklist.....	13
1 Aesthetics.....	13
2 Agriculture and Forestry Resources.....	19
3 Air Quality.....	23
4 Biological Resources.....	33
5 Cultural Resources.....	41
6 Energy.....	47
7 Geology and Soils.....	55
8 Greenhouse Gas Emissions.....	65
9 Hazards and Hazardous Materials.....	75
10 Hydrology and Water Quality.....	83
11 Land Use and Planning.....	95
12 Mineral Resources.....	101
13 Noise.....	103
14 Population and Housing.....	117
15 Public Services.....	121
16 Recreation.....	129
17 Transportation.....	131
18 Tribal Cultural Resources.....	141
19 Utilities and Service Systems.....	145
20 Wildfire.....	155
21 Mandatory Findings of Significance.....	159
References.....	163
Bibliography.....	163
List of Preparers.....	167

Tables

Table 1 Air Quality Thresholds of Significance.....	26
Table 2 Commercial Employee Generation Rates.....	28
Table 3 Approximate Construction Emissions (pounds/day).....	29

Table 4	Approximate Operational Average Daily Emissions (pounds/day).....	30
Table 5	Operational Annual Average Emissions (tons/year).....	30
Table 6	Estimated Fuel Consumption during Construction.....	50
Table 7	Estimated Annual Operational Energy Consumption.....	51
Table 8	Project Consistency with the County of Santa Cruz Climate Action Strategy.....	52
Table 9	Project Consistency with the Watsonville 2030 Climate Action & Adaptation Plan.....	53
Table 10	Project Consistency with the County of Santa Cruz General Plan.....	53
Table 11	Project Consistency with the City of Watsonville General Plan.....	54
Table 12	GHG Performance Threshold Determination.....	71
Table 13	Combined Annual GHG Emissions.....	72
Table 14	Project Consistency with the AMBAG 2045 MTP/SCS.....	73
Table 15	Project Consistency with the County General Plan.....	73
Table 16	Environmental Goals and Policies of the Santa Cruz County General Plan.....	96
Table 17	Human Response to Different Levels of Groundborne Vibration.....	105
Table 18	Maximum Allowable Noise Exposure – Stationary Sources ¹	108
Table 19	City of Watsonville Noise and Land Use Compatibility Guidelines.....	110
Table 20	Construction Equipment Noise Levels.....	113
Table 21	Vibration Levels at Sensitive Receivers.....	115
Table 22	Watsonville Water Supply and Demand Through 2045 (AFY).....	152
Table 23	Project Generated Solid Waste and Facility Capacity.....	154

Figures

Figure 1	Regional Location.....	4
Figure 2	Project Location.....	5
Figure 3	Conceptual Master Plan.....	7

Appendices

Appendix A	Conceptual Master Plan
Appendix B	CalEEMod Output Files
Appendix C	Transportation Analysis
Appendix D	Energy Calculations
Appendix E	Noise Measurements and Calculations

Initial Study

1. Project Title

Freedom Campus Master Plan

2. Lead Agency Name and Contact

County of Santa Cruz
Department of Public Works
701 Ocean Street, Room 410
Santa Cruz, CA 95060

Contact: Travis Cary

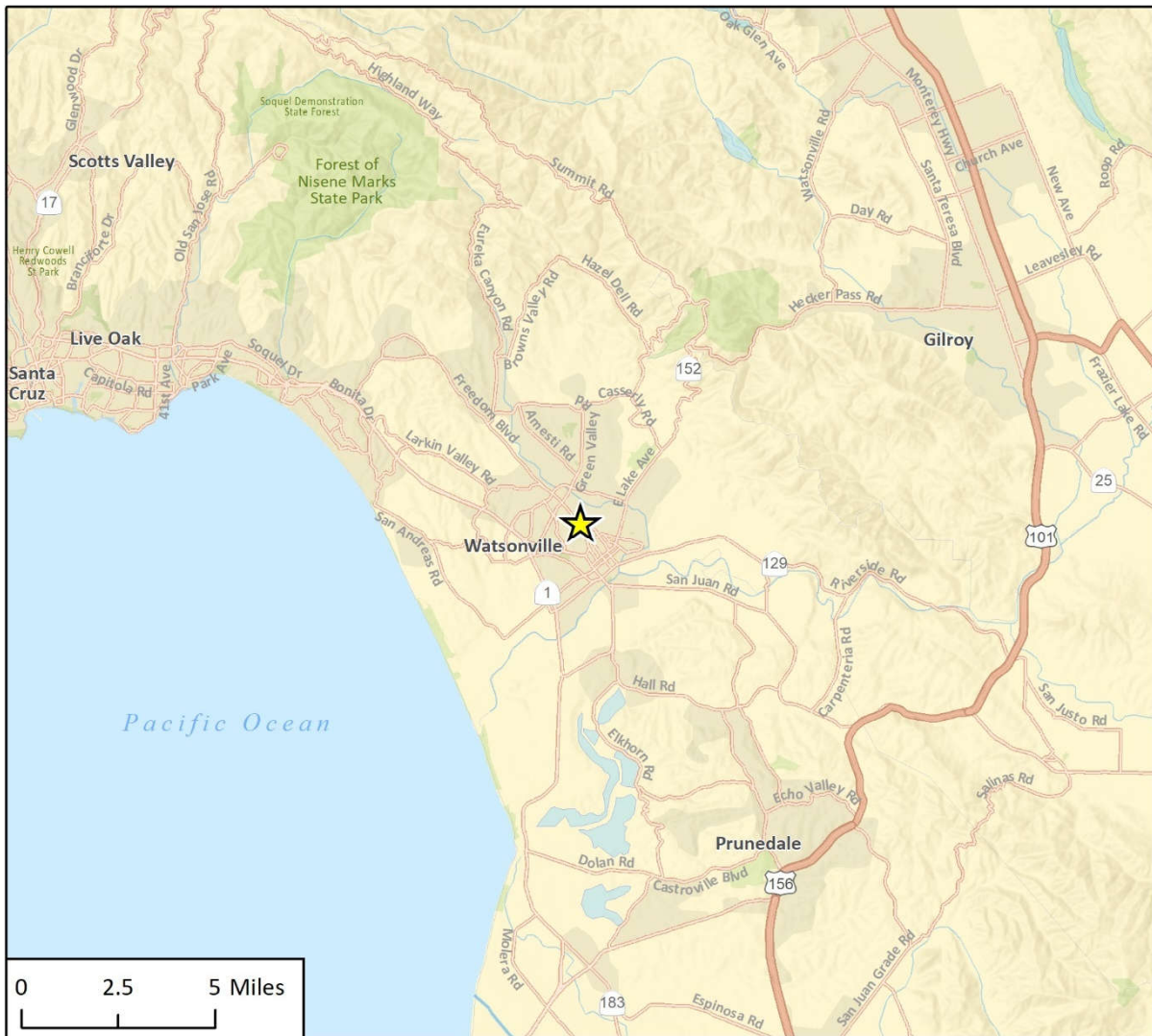
3. Project Location

The project site is located at 1430 Freedom Boulevard in the City of Watsonville, California (City). The project site consists of Assessor's Parcel Number 019-017-07 and is approximately 9.5 acres in size. While the project site is in the City of Watsonville, it is owned by the County of Santa Cruz (County). The site is surrounded by a cemetery and an apartment building to the north, Madison Street and single-family homes to the east, Freedom Boulevard to the west, and Crestview Drive to the south. Figure 1 shows the site location in a regional context. Figure 2 shows the location of the site relative to the surrounding area.

4. General Plan Designation and Zoning

The project site is designated as Public/Quasi-Public under the City of Watsonville General Plan, which allows government or quasi-public buildings or facilities, public utility facilities, active and passive recreational facilities, schools, and hospitals. The site is zoned as Public Facilities under the Watsonville Municipal Code (WMC), which allows several public uses including but not limited to cemeteries, clinics and rehabilitation facilities, community centers and related facilities, residential uses, and public or quasi-public facilities.

Figure 1 Regional Location



Basemap provided by Esri and its licensors © 2022.

★ Project Location

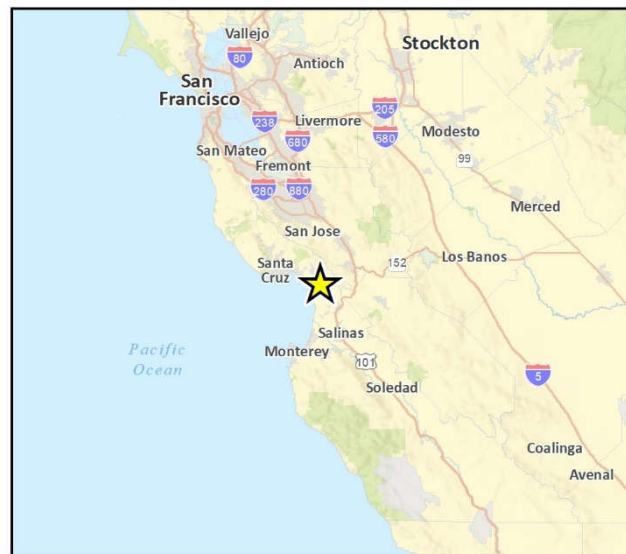


Fig 1 Regional Location

Figure 2 Project Location



5. Existing and Surrounding Land Uses

The project site is currently occupied by six single-story office and medical buildings, owned by the County of Santa Cruz (County). Uses within these buildings include a County health and dental center, a County agricultural Cooperative Extension office, a 4-H youth program office, and a County probation center. The six buildings total approximately 53,000 gross square feet. The buildings are surrounded by surface parking and minimal landscaping including grasses, shrubs, and trees; altogether, the existing buildings and associated parking occupy approximately 5.4 acres of the project site. There is also a California Native Plant Society (CNPS) native garden planted in this area. The eastern half of the site, approximately 4.1 acres, is generally bisected north-south by one drive aisle with surface parking and is dominated by ruderal grasses. The site contains approximately 55 trees and is relatively flat, with an average elevation of 95 feet above mean sea level. Surrounding land uses include commercial, residential, and public/quasi-public lands. A cemetery and an apartment building are immediately north of the site, and single-family residential uses are east of the site across Madison Street. A shopping center is to the south of the site, across Crestview Drive, with restaurants, a furniture store, a gym, and large surface parking lot. Another shopping center is west of the site across Freedom Boulevard, with a grocery store, restaurant, and paint stores. An aerial map of the site and surrounding land uses is shown above in Figure 2.

6. Description of Project

The County's Long-Range Facilities Plan (LRFP), approved by the County Board of Supervisors in 2021, determined that four of the six buildings on site are in poor condition and the remaining two buildings would become obsolete within 15 to 20 years. The LRFP recommended that the existing facilities located in these six County-owned buildings be demolished and replaced with modernized facilities. The LRFP determined that updated facilities would consolidate existing County services at the project site into fewer, higher-intensity buildings. The LRFP also recommended that the County further evaluate the potential for housing development on a portion of the site.

Consistent with the findings and recommendations of the County's LRFP, the proposed project would consist of adoption of the Freedom Campus Master Plan ("Master Plan" or "project") and redevelopment of the project site using design concepts outlined in the Master Plan. As shown on Figure 3, the Master Plan would involve a multi-stage redevelopment of the project site, including demolition of all six existing on-site buildings, construction of up to one or more new health services buildings that would consolidate existing County health services, and designate an approximately four-acre portion of the site for residential development consisting of one or more residential buildings with a combined total of up to 160 housing units. The project would also involve providing on-site parking for the health service building or buildings. Parking would be either surface parking or a new parking garage, or a combination of both. The conceptual Master Plan is included as Appendix A to this IS-MND.

Figure 3 Conceptual Master Plan



Note: Figure is not scale and North is approximate.

The Master Plan is not a formal application for demolition or redevelopment of the site. Instead, the Master Plan is a conceptual planning document that envisions the desired redevelopment of the project site. Design and engineering of individual buildings and components envisioned in the Master Plan would occur at later times or stages, depending on need for services, market demand, and other conditions. This IS-MND presents a broad- or program-level analysis of the potential environmental impacts that could occur from implementation of the different components of the Master Plan.

Demolition and Construction

The Master Plan would require demolition of all existing buildings on the project site. The existing County health services building would be demolished in stages such that health services would continue to be provided on-site while the new health services building, or buildings, are under construction. Once the new building or buildings are constructed, health services would resume operation in those buildings, and demolition of the existing building(s) would be fully completed. Most non-health services offices that operate at the project site would be permanently relocated to an existing County facility, but some may continue to operate at the site consistent with existing conditions. For example, the County's Probation Department may continue to operate on site, consistent with existing conditions.

Health Services Building(s)

The new health services building or buildings would be two stories in height, with an average floor-to-floor height of 15 feet and a total building height of approximately 35 feet. Regardless of the number of buildings, the health services building(s) would comprise a total of 70,000 to 85,000 square feet. The building(s) would house the health services that are currently offered at the project site and would include outpatient and administrative functions such as adult and children's primary care, dental services, adult and children's behavioral sciences, and offices for the County's Public Health Division. Up to 5,000 square feet of the building(s) would be dedicated to community-serving uses, which may include but would not be limited to a community teaching kitchen and a multi-purpose community room. Most non-health services currently located at the project site would be relocated to an existing County facility. However some other County services that operate on the site currently may continue to operate on site, consistent with existing conditions.

Residential Building(s)

The proposed Master Plan would designate approximately four acres of the project site for residential development. The proposed Master Plan does not specify or limit the possible housing types or configuration, but the project site would contain up to 160 residential units and have a residential density of approximately 40 units per acre. Up to 75 percent of the units, or 120 units, would be designated as affordable housing. The residential development would be constructed as solar ready, meaning that solar panels could easily be added at the discretion of the developer.

Parking, Access, and Circulation

The Master Plan would allow construction of approximately 550 parking spaces to serve the County health services building(s) and the residential building(s). Parking would be provided either as surface parking or within a detached parking structure. If constructed, the parking structure would be between 15 feet and 35 feet in height and would be located adjacent to the health services

building(s). Either the parking structure or surface parking would be equipped with charging stations for electric vehicles.

The site would be accessible via one or more of the existing driveways on Freedom Boulevard, Crestview Drive, and Madison Street. The residential building or buildings would likely have a separate driveway from the health services building or buildings.

7. Project Related Approvals, Permits, and Agreements

Approval of the Master Plan would require the County of Santa Cruz to adopt the proposed Master Plan. Because the Master Plan is a conceptual vision for the site and not a formal site plan or construction application, no permits are needed for its adoption. This IS-MND presents a broad- or program-level analysis of the potential environmental impacts that could occur from implementation of the different components of the Master Plan.

Implementation of the Master Plan, if approved, would require permits and approvals such as but not limited to City of Watsonville demolition and building permits, design review, and a potential rezone approval from the City of Watsonville for the future residential portion of the project site. Future approvals from the City of Watsonville may require additional environmental review with the City of Watsonville as the lead agency.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

Determination

Based on 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 to 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 “less than significant with mitigation incorporated” 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.
- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Environmental Checklist

1 Aesthetics

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized 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 a 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The project site is currently developed in an urbanized area of Watsonville. The western half of the site is occupied by six single-story office and health services buildings, with concrete and wood-paneled exteriors painted in neutral beige and brown colors. Surface parking, as well as ornamental grasses, shrubs, and trees, are dispersed around the buildings and throughout the site. The eastern half of the site is bisected north-south by one drive aisle with surface parking, and is dominated by ruderal grasses. From the project site, there are views of the shopping centers to the south and to the west; the cemetery and apartment building to the north; and of the residential area to the east.

Scenic Views

The City of Watsonville is in the Pajaro Valley along the southern limits of Santa Cruz County. The City is immediately surrounded by agricultural lands and rangeland, with long range views of the Santa Cruz Mountains to the north and east and the Gabilan Range to the southwest. The project site is approximately six miles south and four miles west of the Santa Cruz Mountains foothills, and approximately 12 miles northeast of the Gabilan Range. Intermittent long-range views of these

mountain ranges are visible from the project site, but views are limited to due distance and intervening city development.

State Scenic Highways

State Route 1 (SR 1) and SR 152 are both listed as eligible for state scenic highway designation by the California Department of Transportation (Caltrans). There are no officially designated state scenic highways in Watsonville or Santa Cruz County (Caltrans 2019). SR 1 generally borders Watsonville to the west, and SR 152 enters Watsonville from the northeast before pivoting to the west in the southeastern portion of the city. The project site is approximately 1.5 miles east of SR 1 and 0.8 mile north of SR 152. Due to intervening structures, the project site is not visible from either state route.

Lighting and Glare

Sources of light on the project site include approximately five overhead streetlights, which provide nighttime lighting throughout the surface parking lot, and exterior lights located at the entrances of several of the existing on-site buildings. Light is also present on and around the project site due to adjacent and nearby sources, such as the existing residential and commercial uses adjacent to the project site, streetlights on Freedom Boulevard east of the project site, and vehicle headlights on surrounding roadways and within nearby surfacing parking lots.

Regulatory Setting

California State Scenic Highway Program

The California State Scenic Highway Program requires a local governing body to enact a Corridor Protection Program that protects and enhances the resources along highways of State importance. The state scenic highway designation serves to protect scenic corridors, mitigate activities within scenic corridors, make development more compatible with the environment and preserve views of hillsides.

City of Watsonville Municipal Code

The City's Municipal Code includes several regulations associated with protection of the City's visual character and control of light and glare. Chapter 14-16 of WMC defines land use districts and includes design standards, maximum building height, and setback requirements. Pursuant to Section 14-16.802 of WMC, government offices in Public Facilities zoning districts are subject design review. Chapter 8-6 of WMC governs signage in the City.

County of Santa Cruz General Plan and Local Coastal Program

The Conservation and Open Space Element of the County's General Plan and Local Coastal Program includes the following objectives and policies for protecting the aesthetic value of visual resources and that are applicable to the proposed project (County of Santa Cruz 1994):

Objective 5.10a. Protection of Visual Resources. To identify, protect, and restore the aesthetic values of visual resources.

Objective 5.10b. New Development in Visual Resource Areas. To ensure that new development is appropriately designed and constructed to have minimal to no adverse impact upon identified visual resources.

Policy 5.10.2. Development Within Visual Resource Areas. Recognize that visual resources of Santa Cruz County possess diverse characteristics and that the resources worthy of protection

may include, but are not limited to, ocean views, agricultural fields, wooded forests, open meadows, and mountain hillside views. Require projects to be evaluated against the context of their unique environment and regulate structure height, setbacks and design to protect these resources consistent with the objectives and policies of this section. Require discretionary review for all development within the visual resource area of Highway 1, outside of the Urban/Rural boundary, as designated on the General Plan and Local Coastal Program Visual Resources Map and apply the design criteria of Section 13.20.130 of the County's zoning ordinance to such development.

Policy 5.10.3. Protection of Public Vistas. Protect significant public vistas as described in policy 5.10.2 from all publicly used roads and vista points by minimizing disruption of landform and aesthetic character caused by grading operations, timber harvests, utility wires and poles, signs, inappropriate landscaping and structure design. Provide necessary landscaping to screen development which is unavoidably sited within these vistas.

Policy 5.10.10. Designation of Scenic Roads. The following roads and highways are valued for their vistas. The vistas from these roads shall be afforded the highest level of protection.

- Highway 1: From San Mateo County to Monterey County
- Route 152: from Route 1 to Santa Clara County

(note Policy 5.10.10 lists additional roads designated as scenic, but these other roads are not near the project site and not listed here)

Policy 5.10.12. Development Visible from Urban Scenic Roads. In the viewsheds of urban scenic roads, require new discretionary development to improve the visual quality through siting, architectural design, landscaping and appropriate signage. (See policies 5.10.18, 5.10.19 and 5.10.20.)

Policy 5.10.13. Landscaping Requirements. All grading and land disturbance projects visible from scenic roads shall conform to the following visual mitigation conditions:

- (a) Blend contours of the finished surface with the adjacent natural terrain and landscape to achieve a smooth transition and natural appearance; and
- (b) Incorporate only characteristic or indigenous plant species appropriate for the area.

Policy 5.10.18. Signs Visible from Scenic Roads. Actively discourage the placement of signs which will be visible from scenic roads; where allowed, require strict compliance with the County Sign ordinance to minimize disruption of the natural scenic qualities of the viewshed. Give priority to sign abatement programs for scenic roads.

Policy 5.10.20. Highway One Signage in Urban Areas. In the urban Highway 1 corridor, allow signage where consistent with the Sign ordinance and any applicable village, town, community, or specific plan.

Policy 5.10.21. Illuminated Signs Visible from Scenic Roads. In accordance with the County Sign ordinance, allow illuminated signs to be visible from scenic roads only for state and county directional and information signs and in designated commercial and visitor-serving areas. Seek to eliminate all other non-conforming illuminated signs which are visible from scenic roads.

Policy 5.10.22. Requirement for Sign Plans. Require new project submittal applications to include standard road sign designs for directional, access, and business identification and designate appropriate locations for these signs consistent with the County Sign ordinance and Caltrans requirements.

City of Watsonville General Plan

The City of Watsonville 2005 General Plan Urban Design and Scenic Resources Element contains several goals and policies related to the preservation of visual resources and guidelines for new development in the city. Applicable goals and policies include:

Goal 5.1: Visual resources. Preserve and enhance the built and natural visual resources within Watsonville.

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.

Goal 5.9: Scenic corridors. Protect and enhance the views of and from the scenic streets and highways in Watsonville and the Planning Area.

Goal 5.10: Natural Scenic Resources. Conserve and enhance natural resources that contribute to the visual, recreational, and educational aesthetics of Watsonville. Such resources include: wetlands, sloughs, rivers, lakes, hillsides and stands of vegetation.

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.

Goals and policies intend for new development to be visually consistent with the existing visual character in the city, and to protect and enhance views of scenic corridors and natural scenic resources in and around Watsonville. Further, the Urban Design and Scenic Resources Element recognizes the following scenic routes throughout the city:

- East Lake Avenue from Main Street to Carlton Road
- East Beach Street from Main Street to Beck Street
- Main Street from SR 1 to the Pajaro River
- Harkins Slough Boulevard
- Airport Boulevard
- Brewington Avenue from Montecito Avenue to East Lake Avenue
- Holohan Road
- Riverside Drive/SR 129 from SR 1 to Salsipuedes Creek
- SR 1

Impacts Assessment

a. *Would the project have a substantial adverse effect on a scenic vista?*

The proposed project would involve demolition of the six existing buildings on site, and the construction of one or more County health services buildings and at least one residential building and a potential parking garage. The height of the proposed health services and parking structures

would be up to 35 feet and similar to surrounding development, such as the existing three-story apartment building to the north, one- to two-story residences to the east, and commercial structures to the south and west of the project site. Views of scenic vistas, such as the Santa Cruz Mountains or the Gabilan Range, are already limited from the project site due to existing buildings and infrastructure which obstruct distant vistas at the north, east and southwest portions of the site. Views from the project site and across the project site include views of existing development, such as the apartment building, single-family residences, and commercial structures, and these views are not scenic vistas. Therefore, the project would not result in a substantial effect on a scenic vista, and the impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

As described above in *Existing Setting*, there are no state-designed scenic highways in Watsonville. The nearest eligible state scenic highways include SR 1 and SR 152, and the project site is not visible from these state routes due to intervening development. Because the project site is not within a state scenic highway or visible from such a highway, there would be no impact.

The project site is also not in the vicinity of the scenic routes designated by the County of Santa Cruz in its General Plan or the City of Watsonville in its General Plan. The nearest scenic route identified by the County in its Conservation and Open Space Element is SR 152, which is approximately 0.8 mile east of the project site. The project site is not visible from SR 152 due to distance and intervening development. The nearest scenic route identified by the City in its Urban Design and Scenic Resources Element is Holohan Road, which is approximately 0.8 mile north of the project site. The project site is not visible from Holohan Road due to distance and vegetation along Corralitos Creek, which runs between Holohan Road and the project site, approximately 0.4 mile from the site. Therefore, the proposed project would have no impact to scenic resources within the corridor of a state scenic highway or scenic route.

NO IMPACT

- c. Would the project, in non-urbanized 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 a 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?*

The project site is in an urbanized area characterized by existing development such as a multi-family residential building, one- to two-story single-family residences, commercial structures, and parking lots. The proposed development, including County health services building(s) and residential building(s), would be consistent with the visual character and quality of the surrounding area. Development facilitated by the Master Plan would be designed to conform with applicable goals and policies of the County's General Plan and would be required to demonstrate consistency during design review. Implementation of the project would require a rezone of part of the project site to accommodate the proposed residential building(s); once a rezone is approved, the residential building(s) would and must be consistent with City design guidelines and massing, height, and setbacks would be consistent with the zoning ordinance. Therefore, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

As described above, the site is currently occupied with six County services buildings with exterior lighting, and a surface parking lot with overhead nighttime lighting. The proposed project would involve demolition and grading, at which time the exterior lights and the overhead lights would be removed. Following completion of construction, the project would include new lighting for the proposed development, which could include but is not limited to exterior building lighting and overhead parking lighting, interior lighting visible through windows, car headlights, and driveway lights. Although the project would introduce new sources of light, the proposed lighting would be similar to surrounding land uses that already contribute to ambient light levels at night in the project area. The project would not generate major sources of glare beyond current conditions. The facades of the health services building(s) and residential building(s) would not include surfaces that would generate substantial glare because consistency with either County or City design guidelines would be required. For example, the proposed residential building or buildings would be subject to the City's residential development standards, which are contained in City Resolution 316-87. These standards include specific requirements to prevent light pollution from new development. Therefore, impacts associated with light and glare would be less than significant.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The California Department of Conservation (DOC) designates the project site as Urban and Built-Up Land (DOC 2020). Urban and Built-Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Urban and Built-Up Land is not Important Farmland. The project site is zoned as Public Facilities and is not zoned or used for agriculture.

The California Environmental Quality Act (CEQA) requires the evaluation of forest and timber resources where they are present. The project site is in a developed urban area. The site does not contain forest land as defined in Public Resources Code section 12220(g), timberland as defined by

Public Resources Code section 4526, or property zoned for Timberland Production as defined by Government Code section 51104(g).

Regulatory Setting

Williamson Act

The Williamson Act (California Land Conservation Act of 1965) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are lower than full market value of the property because they are based on farming and open space uses.

Farmland Mapping and Monitoring Program

The California Natural Resources Agency's Farmland Mapping and Monitoring Program (FMMP) provides maps and data to decision makers to assist them in making informed decisions regarding the planning of the present and future use of California's agricultural land resources.

Forest Land and Timberland

Public Resources Code Section 12220(g) identifies forest land as land that can support a 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefit.

Public Resources Code Section 4526 identifies timberland as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

County of Santa Cruz General Plan and Local Coastal Program

The Conservation and Open Space Element of the County's General Plan and Local Coastal Program includes the following objectives and policies for protecting agricultural resources that are applicable to the proposed project (County of Santa Cruz 1994):

Objective 5.13: Commercial Agricultural Land. To maintain for exclusive agricultural use those lands identified on the County Agricultural Resources Map as best suited to the commercial production of food, fiber and ornamental crops and livestock and to prevent conversion of commercial agricultural land to non-agricultural uses. To recognize that agriculture is a priority land use and to resolve policy conflicts in favor of preserving and promoting agriculture on designated commercial agricultural lands.

City of Watsonville General Plan

The Environmental Resource Management Element of the Watsonville General Plan recognizes that the agricultural heritage of Watsonville and the Pajaro Valley is an important part of Watsonville's character, and that the city is generally surrounded by agricultural lands. Some agricultural lands exist within the General Plan's Planning Area, including lands designed by the County as Commercial Agricultural approximately 0.5 mile northeast of the project site. The Environmental Resource Management Element contains the following goal and measure related to agricultural resources (City of Watsonville 1994):

Goal 9.7: Agricultural soils. Limit the urbanization of productive agricultural soils to only those parcels contiguous with existing urban use, best suited for urban development, and within the urban limit line.

Measure 9.E.6: Agricultural land conservation. The City shall encourage retention of agricultural land beyond its urban limit line.

Impacts Assessment

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- c. *Would the project 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 51104(g))?*
- d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*
- e. *Would the project 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?*

The project site is in an urbanized and developed area. Neither farmland nor forested lands occur on or adjacent to the project site. The site is not zoned for agriculture, forest land, nor timberland production. According to maps prepared by the DOC, the site is designated as Urban and Built-Up Land and contains no mapped Farmland (DOC 2020a). Further, the site is not subject to a Williamson Act Contract (DOC 2016). Accordingly, the proposed project would have no impact on agriculture and forestry resources.

NO IMPACT

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The project site is in the North Central Coast Air Basin (NCCAB), which consists of Monterey, San Benito, and Santa Cruz counties. The NCCAB covers an approximately 5,159 square mile area located within the central coast of California and is bounded by mountains to the north and east. The Monterey Bay Air Resources District (MBARD) is the designated air quality control agency for the Basin. Both the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards represent safe levels of contaminants that avoid specific adverse health effects associated with each pollutant. As the local air quality management agency, MBARD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Air Pollutants of Concern

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_x). These precursor pollutants react under certain meteorological conditions to form high ozone levels. High ozone levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant of the NCCAB. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM₁₀) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM_{2.5}). Elevated concentrations of PM₁₀ and PM_{2.5} are the result of both region-wide or cumulative emissions and localized emissions. High particulate matter levels aggravate

respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality, usually because they cause cancer. TACs include, but are not limited to, the criteria air pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. According to CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs.

Sensitive Receptors

There are groups of people more affected by air pollution than others. MBARD defines sensitive receptors as any residence, including private homes, condominiums, apartments, and living quarters; education resources such as preschools and K-12 schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. Sensitive receptors also include long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing (MBARD 2008). The closest sensitive receptors to the project site are existing single-family residences immediately east of the project site across Madison Street and an apartment building immediately north of the project site.

Odors

Odors represent emissions of one or more pollutants that are a nuisance to healthy persons and may trigger asthma episodes in people with sensitive airways. Pollutants associated with objectionable odors include sulfur compounds and methane. Typical sources of odors including landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries (MBARD 2008). The site is currently developed with County health service buildings and offices that do not produce substantial odors.

Regulatory Setting

Federal

CLEAN AIR ACT

The Clean Air Act (CAA) of 1970 is the comprehensive federal law that regulates air emissions from stationary and mobile sources. The CAA authorizes the U.S. EPA to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant

Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States. The federal CAA allows states to adopt more stringent standards or to include additional pollution species.

TITLE III OF THE FEDERAL CLEAN AIR ACT

The CAA was amended in 1990 to better address hazardous air pollutants (HAPs) (Title III). Title III offers a comprehensive plan for achieving significant reductions in emissions of HAPs from major sources. It includes a list of 189 toxic air pollutants of which emissions must be reduced. The U.S. EPA maintains and updates a list of source categories including (1) major sources emitting 10 tons per year of a single pollutant, or 25 tons per year of a combination of those pollutants; and (2) area sources (smaller sources, such as dry cleaners). As required by Title III, the U.S. EPA developed Maximum Achievable Control Technology (MACT) standards. MACT standards use the HAP emissions of the best-performing industry sources to set the “MACT floor”, which becomes the minimum standard that an industry must at least meet in order to comply with the CAA.

State

CALIFORNIA CLEAN AIR ACT AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS

As a part of the California Environmental Protection Agency, CARB is responsible for the coordination and administration of both federal and state air pollution control programs in California. The federal CAA allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. The California Clean Air Act became effective in 1989 and requires all areas of the state to attain the state ambient air quality standards at the earliest practicable date. To that end, California has adopted the California Ambient Air Quality Standards that are equal to or stricter than the federal standards for six criteria air pollutants. The California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations. Similar to the federal CAA, areas have been designated as attainment, nonattainment, or unclassified with respect to the state ambient air quality standards.

RISK REDUCTION PLAN TO REDUCE PARTICULATE MATTER EMISSIONS FROM DIESEL-FUELED ENGINES AND VEHICLES

In September 2000, CARB approved the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (CARB 2000). The plan outlines a comprehensive and ambitious program that includes the development of numerous control measures aimed at substantially reducing emissions from new and existing on-road vehicles (e.g., heavy-duty trucks and buses), off-road equipment (e.g., graders, tractors, forklifts, sweepers, and boats), portable equipment (e.g., pumps), and stationary engines (e.g., stand-by power generators). CARB has adopted several regulations that will reduce diesel emissions from in-use vehicles and engines throughout California. In some cases, the particulate matter reduction strategies also reduce smog-forming emissions such as NO_x. As an ongoing process, CARB reviews air contaminants and identifies those that are classified as TACs. CARB also continues to establish new programs and regulations for the control of TACs, including diesel particulate matter, as appropriate.

Regional

MONTEREY BAY AIR RESOURCES DISTRICT

MBARD is the regional, government agency that regulates sources of air pollution within Santa Cruz, Monterey, and San Benito counties. MBARD and other agencies prepare clean air plans as required under the state and federal CAAs. MBARD adopted the 2012-2015 Air Quality Management Plan (AQMP) to make progress toward meeting the State ozone standard. Reducing NO_x emissions is crucial for reducing ozone formation. As the primary NO_x emissions are from mobile sources, the AQMP includes measures to reduce NO_x emissions, focusing on mobile sources.

MBARD has published CEQA Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of projects (MBARD 2008). Table 1 presents MBARD’s significance thresholds for construction (daily) and operational (annual)-related criteria air pollutants and precursor emissions. These represent levels at which a project’s individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin’s existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if construction or operational emissions would exceed the thresholds shown in Table 1.

Table 1 Air Quality Thresholds of Significance

Pollutant	Source	Threshold of Significance
Construction Impacts		
PM ₁₀	Direct	82 lbs/day ¹
Operational Impacts		
VOC	Direct and Indirect	137 lbs/day
NO _x	Direct and Indirect	137 lbs/day
PM ₁₀	On-site	82 lbs/day ²
CO	N/A	LOS at intersection/road segment degrades from D or better to E or F or V/C ratio at intersection/road segment at LOS E or F increases by 0.05 or more or delay at intersection at LOS E or F increases by 10 seconds or more or reserve capacity at unsignalized intersection at LOS E or F decreases by 50 or more
	Direct	550 lbs/day
SO _x , as SO ₂	Direct	150 lbs/day

Notes: lbs/day = pounds per day; PM₁₀ = particulate matter with a diameter of 10 micrometers or less; VOC = volatile organic compounds (also referred to as ROG, or reactive organic gases); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; SO₂ = sulfur dioxide

¹ This threshold only applies if construction is located nearby or upwind of sensitive receptors. In addition, a significant air quality impact related to PM₁₀ emissions may occur if a project uses equipment that is not “typical construction equipment” as specified in Section 5.3 of the MBARD CEQA Guidelines.

² MBARD’s operational PM₁₀ threshold of significance applies only to on-site emissions, such as project-related exceedances along unpaved roads. These impacts are generally less than significant. For large development projects, almost all travel is on paved roads, and entrained road dust from vehicular travel can exceed the significance threshold.

Source: MBARD 2008

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the Santa Cruz County General Plan contains programs and policies related to air quality that pertain to meeting state and federal air standards, protecting the public from air quality related hazards and preventing scenic impacts due to poor air quality. Policies 5.18.1 through 5.18.3, below, require new developments to achieve consistency with the MBARD AQMP, meet established pollutant thresholds, and mitigate high levels of air quality pollutants (County of Santa Cruz 1994).

Policy 5.18.1: New Development. Ensure new development projects are consistent at a minimum with the Monterey Bay Unified Air Pollution Control District Air Quality Management Plan and review such projects for potential impact on air quality.

Policy 5.18.2: Non-Attainment Pollutants. Prohibit any net increase in emissions of non-attainment pollutants or their precursors from new or modified stationary sources with emit 25 tons per year or more of such pollutants.

Policy 5.18.3: Air Quality Mitigation. Require land use projects generating high levels of pollutants (i.e., manufacturing facilities, hazardous waste handling operations) to incorporate air quality mitigations in their design.

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville General Plan Environmental Resource Management Element contains goals and policies related to air quality. Applicable goals and policies include:

Goal 9.4: Air quality. Maintain or improve the present air quality level within the Pajaro Valley.

Goal 9.11: Hazardous materials. Protect the air, water, soil, and biotic resources from damage by exposure to hazardous materials through aggressive management of hazardous materials.

Policy 9.C: Air quality. The City shall cooperate with the Monterey Bay Unified Air Pollution Control District (MBUAPCD)¹ to maintain and improve regional air quality.

Measure 9.C.1: Referral to MBUAPCD. The City shall refer projects with identifiable air quality impacts to the MBUAPCD for recommendations on appropriate air quality impact mitigations.

Measure 9.C.9: Environmental Review. The City shall use the environmental review process to determine both stationary source and transportation related potential air quality impacts for project proposals.

Measure 9.C.10: Construction-related Impacts. The City shall require construction contractors to implement a dust abatement program to reduce the effect of construction on local PM10 concentrations.

Methodology

This air quality analysis conforms to the methodologies recommended in the MBARD's CEQA Air Quality Guidelines (2008). The project's construction and operational emissions were estimated

¹ Since publication of the Watsonville General Plan in 1994, the MBUAPCD changed names to become the Monterey Bay Air Resources District (MBARD).

using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod uses project-specific information, including the proposed land uses, square footages of each use (e.g., County health services, County offices, and residential) and project location to estimate construction and operational emissions from new development. Emissions for the project were modeled based on the project description detailed in the beginning of this report. However, to provide the most conservative impact analysis, demolition and construction were modeled to occur simultaneously during the same time period, capturing the most potential dust and construction emissions. However, because construction would continue after demolition is complete, at various points into the future, the analysis assumes approximately 25 percent of the development envisioned in the Master Plan would be conducted annually, for a total of four years of construction. This assumption is reasonable because the project envisions long-term development of the site, extending more than four years, and so assuming four years accounts for maximum construction activity any given year during construction. The complete CalEEMod modeling output is provided in Appendix B.

Impacts Assessment

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

A project could be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The Association of Monterey Bay Areas Governments (AMBAG) is the regional planning agency for Monterey, San Benito, and Santa Cruz counties, and addresses regional issues relating to transportation, economy, community development, and environment. Regarding air quality planning, AMBAG has prepared the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), a long-range transportation plan that uses growth forecasts to project trends for regional population, housing and employment growth out to 2045 to identify regional transportation strategies to address mobility needs.

The employment growth forecasts in AMBAG’s 2045 MTP/SCS estimate that the number of jobs in Watsonville would be 30,303 in 2045, up 1,789 jobs from 28,514 in 2020. AMBAG’s 2045 MTP/SCS also projects that Watsonville will have a population of 56,344 by 2045, an increase of 4,829 residents from 51,515 in 2020 (AMBAG 2022). The US Green Building Council estimates that for medical office uses, there is approximately one employee per 225 square feet (US Green Building Council 2008). Further, according to the California Department of Finance (DOF), the City of Watsonville has an average of 3.52 persons per household (DOF 2022). As shown in Table 2, applying employee and resident generation rates to the proposed project buildout, the Master Plan would result in approximately 378 employees and 563 residents on site.

Table 2 Commercial Employee Generation Rates

Land Use	Generation Rate	Proposed Size	Total Persons
County Health Services	1 employee/225 sf	85,000 sf	378 employees
Residential	3.52 persons/dwelling unit	160 units	563 residents
Total			941

Source: AMBAG 2022, DOF 2022; US Green Building Council 2008

The increase of 378 jobs would be within AMBAG’s projected employment increase of 1,789 jobs between 2020 and 2045 for Watsonville. Additionally, the estimated 378 jobs would not represent entirely new employment because the site currently provides employment and jobs in the existing County buildings. The increase of 563 residents would be within the projected population increase of 4,829 residents between 2020 and 2045. Therefore, the project would not cause the area to exceed the regional growth forecasts and would not conflict with the implementation of the AQMP. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project 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?*

CalEEMod Version 2020.4.0 was used to estimate emissions from construction and operation of the site assuming full build-out of the project. The project land use types and size, and a conservative construction schedule were input to CalEEMod. The model output from CalEEMod is included in Appendix B.

Construction-Period Emissions

CalEEMod provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. Detailed CalEEMod inputs are provided in Appendix B. The inputs are based on a combination of CalEEMod defaults and project-specific details provided by the applicant. Examples of project-specific inputs used in the analysis include the size of the proposed buildings.

Table 3 shows maximum daily construction emissions of PM₁₀ exhaust during construction of the project. As indicated in Table 3, predicted construction-period average daily emissions would not exceed the MBARD significance thresholds (shown in Table 1).

Table 3 Approximate Construction Emissions (pounds/day)

Pollutant	Maximum Daily Emissions	Significance Threshold	Significant Impact?
PM ₁₀	7.8	82	No

See Appendix B for CalEEMod worksheets, Table 2.1 (maximum daily emissions provided per summer and winter estimates).

Operational air emissions from the project would be generated primarily from the vehicle trips generated by County employees, persons visiting the County health services offices, residents of the proposed residences, and their visitors. Other less substantial sources of operational emissions include lawn care equipment, such as lawn mowers, and evaporative emissions from architectural coatings and maintenance products (classified as consumer products). CalEEMod was used to estimate emissions from operation of the proposed project assuming full build-out of the proposed health services building or buildings, the residential units, and on-site parking.

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the

model, the higher the emission rates utilized by CalEEMod. CalEEMod was setup to assume full construction of the project is completed within four years, which equates to the full number of operational vehicle trips after four years. The trip generation used for the project is based on default values generated by CalEEMod. The default trip generation rates exceed the traffic rates specified in the Transportation Analysis prepared for the project by Hexagon Transportation Consultants, Inc., which is provided as Appendix C to this Initial Study. Therefore, using the default trip generation rates provides a conservative estimate of pollutant emissions from mobile sources. Table 4 and Table 5 provide the project’s estimated operational emissions. See Appendix B for a detailed description of CalEEMod inputs, including trip generation rates, off-road equipment, energy, and other inputs.

Table 4 Approximate Operational Average Daily Emissions (pounds/day)

Pollutant	Maximum Daily Emissions	Significance Threshold	Significant Impact?
ROG	16.6	137	No
NO _x	12.6	137	No
CO	100.3	550	No
SO _x	0.2	150	No
PM ₁₀	17.8	82	No
PM _{2.5}	4.9	N/A	N/A

See Appendix B for CalEEMod worksheets.

Table 5 Operational Annual Average Emissions (tons/year)

Pollutant	Proposed Project Emissions	Significance Threshold	Significant Impact?
VOC	2.6	10	No
NO _x	1.8	10	No
CO	13.6	n/a	No
SO _x	<0.1	n/a	No
PM ₁₀	2.6	15	No
PM _{2.5}	0.7	10	No

See Appendix B for CalEEMod worksheets.

Note: Table values rounded to the nearest tenth decimal.

As shown in Table 4 and Table 5, operational emissions would not exceed the MBARD significance thresholds. Therefore, the proposed project would not result in a cumulatively considerable net increase in criteria pollutants, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Construction

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2017a).

Generation of DPM from construction projects typically occurs in a single area for a short period. For purposes of this analysis, construction of the proposed project was assumed to occur in four phases years, with approximately 25 percent of the project constructed annually. This is a reasonable analysis assumption because it captures the most intensive amount of construction activity possible at a given time or over a given period. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., four years) is approximately 5.7 percent of the total exposure period used for health risk calculation. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (CARB 2017a).

The maximum PM₁₀ and PM_{2.5} emissions would occur during site preparation and grading activities. These activities would last for approximately 260 days spread over 4 years, as modeled in CalEEMod (see Appendix B). PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. An approximately 4-year construction period represents approximately 5.7 percent of the total 70-year exposure period for health risk calculation. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability is greater than one in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a hazard index greater than one for the Maximally Exposed Individual. This impact would be less than significant.

Operation

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO

concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

MBARD is in conformance with state and federal CO standards, and most air quality monitoring stations no longer report CO levels. As shown in Table 4, the proposed project would result in CO emissions of approximately 100.3 pounds per day, well below the 550 pounds per day threshold. Based on the low background level of CO in the project area, improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project's low level of operational CO emissions, the project would not create new hotspots or contribute substantially to existing hotspots, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The proposed project would not create new sources of odors. During construction, use of diesel-powered vehicles and equipment could temporarily generate localized odors, which would cease upon project completion. The proposed project would result in the development of upgraded County health services building(s) and residential units, and would not include activities, such as landfills, rendering plants, chemical plants, agricultural uses, wastewater treatment plants, and refineries, which are typically associated with the generation of operational odors. Therefore, impacts related to odors would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The approximately 9.5-acre project site is located within an urbanized area of Watsonville. The western half of the project site is developed with six County health services and office buildings, which occupy approximately 5.4 acres. This portion of the site consists primarily of existing buildings, paved surface parking, and limited fragmented areas of landscaping between the six buildings. The approximately 4.1-acre eastern half of the site is bisected north-south by a one-way asphalt driveway with parking, and additional asphalt parking areas that remain from a former emergency mobile home housing site. The non-paved portions of this eastern area are dominated by ruderal non-native vegetation that is regularly maintained through mowing. A row of magnolia trees occurs in this area along Madison Street. The project site also contains approximately 55 trees all of which are non-native landscaping species that have been planted on site. Additionally, the project site also includes a California Native Plant Society (CNPS) garden where native plant species have been planted.

Given that the project site has been disturbed by past and current development, the site does not contain wetlands, riparian areas, or other sensitive habitats types. The site is bounded by Freedom Boulevard to the west and Crestview Drive to the south, and the intersection of these two roads experiences more than 2,500 vehicle trips during morning rush hour (AM Peak Hour) or evening rush hour (PM peak hour) (see Table 5 in Appendix C). Watsonville Slough, part of the South County Slough System begins approximately 600 feet southwest of the project site. A large manmade pond and wetland area occurs on a private parcel approximately 600 feet northeast of the project site, and Corralitos Creek is approximately 0.4 mile north of the project site. The project site is surrounded by urban development and does not adjoin Watsonville Slough or other natural or open space areas.

The evaluation of biological resources was based on information obtained through research and field observations made by biologists from Rincon Consultants and from County Environmental Planning Staff. Prior to conducting field investigations, Rincon Consultants conducted a query of the California Natural Diversity Data Base (CNDDDB) and the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (IPaC) to determine what special-status species have potential to occur in the vicinity of the project site. Other sources consulted during analysis include the California Wildlife Habitat Relationships (CWHR) information system, the USFWS Environmental Online Conservation System (ECOS), Santa Cruz County GIS Maps, aerial imagery of the project site, and personal communications between the County staff biologist and other local botanists. Field investigations conducted on August 4th and August 5th, 2022, were focused on determining if habitat for special status species is present on site. Habitat for special status wildlife species does not occur on site and no special status wildlife were observed during surveys. However, given the mobility of birds, there is potential for any number of birds to occur as transient species on-site, such as brief landing during flight, or as migratory nesting birds during the nesting season. Regarding special-status plant species, biologists determined that potential habitat for Santa Cruz tarplant may occur on the eastern half of this parcel based on proximity to known occurrences and soil type. Focused surveys during the evident and identifiable period for this species were conducted on August 4th and 5th, and Santa Cruz tarplant was not observed on the project site. Additionally, observed ground squirrel activity and continued human disturbance throughout much of this area of the site indicates less than favorable conditions for persistence of this species.

Regulatory Setting

Federal and State

SPECIAL-STATUS SPECIES

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered ‘special-status species.’ Federal and state “endangered species” legislation has provided the US Fish and Wildlife Service (USFWS) and the CDFW with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the “take” of a species listed as threatened or endangered. To “take” a listed species, as defined by the State of California, is “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or “kill” said species. “Take” is more broadly defined by the Federal Endangered Species Act to include “harm” of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Section 15380(b) and (c) of the *CEQA Guidelines* provide that all potential rare or sensitive species, or habitats capable of supporting rare species, are considered for environmental review per the *CEQA Guidelines*. These may include plant species of concern in California listed by the California Native Plant Society and CDFW listed “Species of Special Concern.”

MIGRATORY BIRD TREATY ACT

The Migratory Bird Treaty Act makes it illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, a migratory bird or migratory birds, or the parts, nests, or eggs of such a bird except under the terms of a valid Federal permit (USFWS 2017).

SENSITIVE HABITATS

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation, protection, or consideration by the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the Federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act. U.S. EPA regulations, called for under Section 402 of the Clean Water Act, also include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge into waters of the United States (e.g., streams, lakes, bays, etc.).

Local

Regulatory authority over biological resources is shared by state and local authorities under a variety of statutes and guidelines. Primary authority for biological resources lies within the land use control and planning authority of local jurisdictions, in this case the City of Watsonville.

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The County of Santa Cruz General Plan and Local Coastal Program provides the following objectives and policies to protect biological resources (County of Santa Cruz 1994).

Objective 5.1. Biological Diversity. To maintain the biological diversity of the County through an integrated program of open space acquisition and protection, identification and protection of plant habitat and wildlife corridors and habitats, low-intensity and resource compatible land uses in sensitive habitats and mitigations on projects and resource extraction to reduce impacts on plant and animal life.

Policy 5.1.2. Definition of Sensitive Habitat. An area is defined as a sensitive habitat if it meets one or more of the following criteria:

- (a) Areas of special biological significance as identified by the State Water Resources Control Board.
- (b) Areas which provide habitat for locally unique biotic species/communities, including coastal scrub, maritime chaparral, native rhododendrons, and associated Elkgrass, mapped grasslands in the Coastal Zone, and sand parkland' and Special Forests including San Andreas Coast Live Oak Woodlands, Valley Oak, Santa Cruz Cypress, indigenous Ponderosa Pine, indigenous Monterey Pine and ancient forests.
- (c) Areas adjacent to essential habitats of rare, endangered or threatened species as defined by (e) and (f) below.
- (d) Areas which provide habitat for Species of Special Concern as listed by the California Department of Fish and Game in Special Animals list, Natural Diversity Database.
- (e) Areas which provide habitat for rare or endangered species which meet the definition of Section 15380 of the California Environmental Quality Act.
- (f) Areas which provide habitat for rare, endangered or threatened species as designated by the State Fish and Game Commission, United States Fish and Wildlife Service, or CNPS.
- (g) Nearshore reefs, rocky intertidal areas, seacaves, islets, offshore rocks, kelp beds, marine mammal hauling grounds, sand beaches, shorebird roosting, resting and nesting areas, cliff nesting areas and marine, wildlife or educational/research reserves.
- (h) Dune plant habitats
- (i) All lakes, wetlands, estuaries, lagoons, streams and rivers
- (j) Riparian corridors.

Policy 5.1.6. Development in Sensitive Habitats. Sensitive Habitats shall be protected against a significant disruption of habitat values; and any proposed development within or adjacent to these areas must maintain or enhance functional capacity of the habitat. Reduce in scale, redesign, or if no other alternative exists, deny any project which cannot sufficiently mitigate significant adverse impacts on sensitive habitats unless approval of project is legally necessary to allow a reasonable use of the land.

SANTA CRUZ COUNTY CODE

Sensitive Habitat Protection Ordinance

The County of Santa Cruz Sensitive Habitat Protection Ordinance (Santa Cruz County Code Chapter 16.32) is intended to “minimize the disturbance of biotic communities which are rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activity.” Sensitive habitats under the Santa Cruz County Code relevant to the project include areas that provide habitat for locally unique biotic species/communities, such as oak woodlands and coastal scrub; areas adjacent to essential habitats of rare, endangered or

threatened species, or other rare species considered under CEQA; dunes, wetlands, lagoons, rivers, and riparian corridors; and areas defined as an Environmental Sensitive Habitat Area under the Coastal Act.

A project is required to mitigate any unavoidable environmental impacts to sensitive habitats. The ordinance calls for protection of sensitive habitats “undisturbed by the proposed development activity” or on an adjacent parcel through measures such as conservation easements. Additionally, restoration “commensurate with the scale of the proposed development” is required for degradation of sensitive habitats caused by a project. Exemptions to this ordinance may be granted concurrently with authorized riparian exceptions.

Riparian Corridor and Wetlands Protection Ordinance

The County of Santa Cruz Riparian Corridor and Wetlands Protection Ordinance (Santa Cruz County Code Chapter 16.30) limits development activities in riparian areas² and provides buffer/setback requirements³ based on slope and vegetation composition. Riparian setback exceptions may be authorized by the County on a case by case basis. Exceptions are granted pending an approved application stating the applicant’s proposed activities, best management practices (BMPs), and measures for mitigating impacts to the riparian corridor. Riparian Exception Findings (SCCC 16.30.060) must be met for a Riparian Exception to be authorized. Exemptions to the provisions of this Chapter (SCCC 16.30.050) include activities associated with drainage, erosion control, or habitat restoration measures required as a condition of County approval of a permitted project.

CITY OF WATSONVILLE GENERAL PLAN

The Environmental Resource Management Element of the City’s General Plan outlines goals and implementation measures related to the protection and management of biological resources in the planning area. Applicable goals and measures are listed below (City of Watsonville 1994).

Goal 9.3: Natural resources. Identify and protect the natural resources of the Watsonville Planning Area.

Goal 9.8: Wildlife habitat. Preserve and protect the remaining areas of wildlife habitat for the scenic and scientific value.

Measure 9.B.2: Natural resource mitigations. The City shall require implementation of environmental mitigations on projects that may destroy or impair the future use or existence of natural resources.

Measure 9.B.3: Environmental constraints. The City shall encourage development on land with has the fewest natural resource impacts and discourage or prohibit development on land having multiple natural resource impacts. An environmental constraint matrix shall be developed for use by the City.

Measure 9.B.6: Environmental Review. The City shall conduct an appropriate environmental review process and require that proposed projects adjacent to surrounding, or containing,

² The Santa Cruz County Code defines riparian vegetation/woodland as “those plant species/woody plant species that typically occur in wet areas along streams or marshes” (Santa Cruz County Code 16.30.030). See also USFWS definition of riparian habitat under the Sensitive Habitats section (USFWS 2009).

³ The ordinance states that a buffer “shall always extend 50 feet beyond the edge of riparian woodland for perennial streams and 20 feet beyond the edge of other woody vegetation as determined by the dripline” (Section 16.330.040).

wetlands be subject to a site-specific analysis which will determine the appropriate size and configuration of areas to buffer wetlands from urban development.

CITY OF WATSONVILLE MUNICIPAL CODE

Watsonville Municipal Code (Chapter 7-13) regulates the removal of historical trees. Historical trees are identified and evaluated by the City's Recreation Department, which designates trees based on character, historical or aesthetic value, or other value. Historic trees cannot be trimmed, altered, or removed without approval from the Recreation and Parks Commission.

Impacts Assessment

- a. *Would the project 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?*

The project site is in a developed, urban area and does not contain habitat for special-status wildlife species other than potential nesting migratory bird species, as described above in *Existing Setting*. Field surveys confirmed that special-status plant species do not occur on the project site. Accordingly, construction of the project would not impact special-status plants or wildlife, with the exception of potential effects on nesting migratory birds. Project construction would require the removal of existing trees, which migratory birds could use for nest sites. The damage or destruction of active nest sites of migratory birds and to the migratory birds themselves would be a potentially significant impact and implementation of mitigation is required. Implementation of Mitigation Measure BIO-1 would reduce this impact to a less than significant level.

Mitigation Measures

BIO-1 Nesting Bird Preconstruction Surveys

Prior to the issuance of tree removal, grading, building or demolition permits (whichever comes first), the project applicant shall schedule all construction activities to avoid the nesting season to the extent feasible. The nesting season for most birds extends from February 1st through August 31st (inclusive). Construction activities include site disturbance such as, but not limited to, tree trimming or removal, demolition, grading, and trenching. If construction activities cannot be scheduled between September 1st and January 31st (inclusive), pre-construction surveys for nesting birds shall be completed by a qualified ornithologist or biologist to ensure that no active nests shall be disturbed during construction activities. This survey shall be completed no more than 14 days prior to the initiation of construction activities during the early part of the breeding season (February 1st through April 30th inclusive) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May 1st through August 31st inclusive). During this survey, the ornithologist/biologist shall inspect all trees and other possible nesting habitats on-site and within 250 feet of the site for nests.

If an active nest is found within 250 feet of the project area to be disturbed by construction, the ornithologist/biologist, in consultation with the California Department of Fish and Wildlife, shall determine the extent of a construction free buffer zone to be established around the nest, (typically 250 feet for raptors and 100 feet for other birds), to ensure that raptor or migratory bird nests shall not be disturbed during project construction.

Prior to tree removal, or approval of grading or demolition permits (whichever occurs first), the ornithologist/biologist shall submit a report indicating the results of the survey and designated buffer zones to the satisfaction of the Director of Planning, Building and Code Enforcement or Director's designee.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

- b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The project site is in an urban area and has been previously disturbed. The project site does not contain riparian habitat, other sensitive natural communities, or wetlands, and none are located on or adjacent to the site (USFWS 2020). As described later in Section 10, *Hydrology and Water Quality*, the proposed project would not have significant impacts on water quality, including surface water. Therefore, the project would have no impact on riparian habitats, other sensitive natural communities, or protected wetlands.

NO IMPACT

- d. *Would the project 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?*

Wildlife corridors are pathways or habitat linkages that connect discrete areas of natural open space otherwise separated or fragmented by topography, changes in vegetation, other natural obstacles, or manmade obstacles such as urban development and roadways. The project site is mostly developed and disturbed, surrounded by development, and does not connect areas of natural open space. The project site is not part of a wildlife movement corridor, and the project would not impede the use of native wildlife nursery sites. Therefore, the project would have no impact on wildlife movement or native wildlife nursery sites.

NO IMPACT

- e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Implementation of the proposed Master Plan would result in the removal of approximately 55 trees on the project site. The County's tree ordinance is found in Chapter 16.34 of the County Municipal Code. The ordinance applies to trees meeting certain criteria that are also located with the Coastal Zone. The project site is not within the Coastal Zone. Therefore, removal of the approximately 55 trees on the project site would not conflict with the County's tree protection ordinance. Additionally, the project would include landscaping the project site, including planting trees.

The City of Watsonville regulates tree removal pursuant to WMC Chapter 7-13. The trees within the project site are not designated as historic trees, which is an official designation described and defined in the City's municipal code (WMC Chapter 7-13). Therefore, the project would not conflict with City of Watsonville historical trees ordinance. Implementation of the project would result in a

less than significant impact with relation to local policies and ordinances protecting biological resources, such as trees.

LESS THAN SIGNIFICANT IMPACT

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans applicable to the project site. The proposed project would not conflict with such plans. There would be no impact.

NO IMPACT

5 Cultural Resources

	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 pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Rincon Consultants, Inc. (Rincon) prepared a Cultural Resources Assessment Report for the project, which is on file at the County Department of Community Development & Infrastructure offices located at 701 Ocean Street, 4th Floor, Santa Cruz. Rincon conducted a search of the California Historical Resources Information System (CHRIS) of the Northwest Information Center located at Sonoma State University on November 3, 2021, and a pedestrian survey of the project site. The records search was conducted for the project site and land within a 0.5-mile radius of the site. The background research, CHRIS records search, and field survey did not identify archaeological sites within the project site, but the record search did identify three cultural resources within 0.5 mile of the project site. Two cultural resources are located outside of the project site, and the third is located adjacent to the project site.

The two cultural resources outside of the project site within a 0.5-mile radius consist of historic buildings, located approximately 0.5 mile southeast and 0.5 mile east of the project site. Immediately adjacent to the project site is the Watsonville Historic District (P-44-000395), initially recorded in 1999. The district was recorded by JRP Historical Consulting Services, which acknowledged the potential for a historic district but recommended further exploration. Even though the resource is referred to as a historic district, no formal evaluation has been prepared; it is not listed on the National Register of Historic Places, the California Register of Historical Resources, or the Watsonville Historic Register.

Additionally, Rincon completed a search of the Native American Heritage Commission (NAHC) Sacred Lands File for the project. The NAHC Sacred Lands File search was returned with positive findings for cultural resources within the project site. Rincon contacted Native American tribes associated with the project site according to the contact list provided by the NAHC. Responses were received from Chairman Patrick Orozco of the Costanoan Ohlone Rumsen-Mutsen Tribe and Canyon Sayers-Roods of the Indian Canyon Mutsun Band of Costanoan. Both representatives indicated that the project site and surrounding areas are considered sensitive due to their proximity to Corralitos

Creek and other natural resources. Mr. Orozco recommended Native American monitoring during ground disturbing activities, and Ms. Sayers-Roods requested to be involved in the project moving forward and stated that more information was preferred before making a recommendation of Native American or archaeological monitoring. Rincon's complete outreach effort and full cultural resources technical study is provided in the Cultural Resources Assessment Report, which is on file at the County offices. Tribal cultural resources are discussed further in Section 18, *Tribal Cultural Resources*.

Regulatory Setting

Federal

NATIONAL REGISTER OF HISTORIC PLACES

The National Historic Preservation Act of 1966 (54 USC 300202 et seq.) enabled the U.S. Department of the Interior's National Park Service (NPS) to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological places. The NPS is responsible for the designation, documentation, and physical preservation of historic sites.

State

CALIFORNIA REGISTER OF HISTORIC PLACES

The California Register of Historic Places, under the Office of Historic Preservation (OHP), is the State's authoritative guide to significant historical and archeological resources. The California Register program encourages public recognition and protection of resources of architectural, historical, archeological and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under the California Environmental Quality Act.

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the County of Santa Cruz General Plan and Local Coastal Program includes goals, objectives, and policies to protect archaeological, historical, and paleontological resources. The goals and policies pertaining to archaeological and historical resources that are applicable to the proposed project are discussed below.

Objective 5.19: Archaeological Resources. To protect and preserve archaeological resources for their scientific, educational and cultural values, and for their value as local heritage.

Policy 5.19.1: Evaluation of Native American Cultural Sites. Protect all archaeological resources until they can be evaluated. Prohibit any disturbance of Native American Cultural Sites without an appropriate permit. Maintain the Native American Cultural Sites ordinance.

Policy 5.19.2: Site Surveys. Require an archaeological site survey (surface reconnaissance) as part of the environmental review process for all projects with very high site potential as determined by the inventory of archaeological sites, within the Archaeological Sensitive Areas, as designated on General Plan and Local Coastal Program Resources and Constraint Maps files in the Planning Department.

Policy 5.19.3: Development Around Archaeological Resources. Protect archaeological resources from development by restricting improvements and grading activities to portions of the property not containing these resources, where feasible, or by preservation of the site through project design and/or use restrictions, such as covering the site with earthfill to a depth that ensures the site will not be disturbed by development, as determined by a professional archaeologist.

Policy 5.19.4: Archaeological Evaluations. Require the applicant for development proposals on any archaeological site to provide an evaluation, by a certified archaeologist, of the significance of the resource and what protective measures are necessary to achieve General Plan and Local Coastal Program Land Use Plan objectives and policies.

Policy 5.19.5: Native American Cultural Sites. Prohibit any disturbance of Native American Cultural Sites without an archaeological permit which requires, but is not limited to, the following:

- (a) A statement of the goals, methods, and techniques to be employed in the excavation and analysis of the data, and the reasons why the excavation will be of value;
- (b) A plan to ensure that artifacts and records will be properly preserved for scholarly research and public education;
- (c) A plan for disposing of human remains in a manner satisfactory to local Native American Indian groups.

SANTA CRUZ COUNTY CODE

The County of Santa Cruz Native American Cultural Sites Ordinance (Santa Cruz County Code Chapter 16.40) establishes regulations for the protection, enhancement, and perpetuation of Native American cultural sites in order to promote the public welfare, and to implement the stated policies of the County's General Plan and the Land Use Plan of the Local Coastal Program. The ordinance defines a Native American cultural site as any mound, midden, cave, place of settlement, burial ground, ceremonial ground, mine, trail, rock art, or other feature or location containing either human remains or artifacts of Native Californians which are at least 100 years of age. The ordinance requires an archaeological survey for discretionary projects that result in ground disturbance and will be located within a mapped archaeological sensitive area.

Whenever a Native American cultural site is discovered during the review of a proposed project, any permit subsequently issued must contain whatever conditions the decision-making body determines to promote the purposes of the ordinance. Conditions could include, but are not limited to:

- Preservation of the site through project design or restrictions on use and/or grading, such as restricting improvement and grading activities to portions of the property not containing the resource, or covering the site with fill to a depth where the site will not be disturbed by development as determined by a professional archaeologist; and/or
- Excavation of the site by a professional archaeologist in order to preserve a sample of the remains, artifacts, or other evidence. Such excavation may take place only as authorized by an archaeological excavation permit.

Pursuant to the Native American Cultural Sites ordinance, any property owner who, at any time in the preparation for or process of excavating or otherwise disturbing the ground, discovers any

human remains of any age, or any artifact or other evidence of a Native American cultural site that reasonably appears to exceed 100 years of age, must:

1. Cease and desist from all further excavations and disturbances within 200 feet of the discovery.
2. Arrange for staking completely around the area of discovery by visible stakes no more than 10 feet apart, forming a circle having a radius of no less than 100 feet from the point of discovery; provided, however, that such staking need not take place on adjoining property unless the owner of the adjoining property authorizes such staking.
3. Notify the Sheriff-Coroner of the discovery if human remains have been discovered. Notify the Planning Director if the discovery contains no human remains.
4. Grant all duly authorized representatives of the Coroner and the Planning Director permission to enter onto the property and to take all actions consistent with the ordinance.

If the Planning Director determines that the discovery is a site of cultural significance, the Director must notify the property owner that the site is of cultural significance and that an archaeological report must be prepared and no further excavation or development may take place except as authorized by an archaeological site development approval.

The County's Historic Preservation ordinance is in Chapter 16.42 and implements the General Plan historic resources policies to designate, preserve, protect, enhance, and perpetuate those historic structures, districts and sites. The ordinance protects and enhances the County's historic structures, objects, sites and districts as a physical record of its heritage.

CITY OF WATSONVILLE GENERAL PLAN

The City of Watsonville General Plan outlines goals and policies to guide planning and development practices within the City. The Environmental Resource Management Element of the Watsonville General Plan contains goals, policies, and implementation measures related to the management of archaeological resources. Applicable goals, policies, and measures are listed below (City of Watsonville 1994):

Goal 9.10: Archaeological resources. Identify and protect prehistoric resources for their scientific, educational, and cultural values.

Policy 9.H: Archaeological resources. The City shall foster and provide for the preservation of cultural resources and artifacts of historic and pre-historic human occupation within the Pajaro Valley.

Measure 9.H.1: Inventory. The City shall maintain an inventory of historic and pre-historic sites, structures, and landmarks of historic and cultural significance in order to determine the potential impacts on these resources from proposed projects.

Measure 9.H.2: Protection Measures. The City shall notify the Regional Office, California Archaeological Site Survey, and Ohlone Indian Cultural Association of projects within identified archaeological sensitive areas. An archaeological site survey by a professional archaeologist may also be required.⁴

⁴ The City of Watsonville General Plan was adopted in 1994. Since its adoption, Assembly Bill 52 (2015) establishes a formal consultation process for projects that may cause a substantial adverse change in the significant of a tribal cultural resource. Assembly Bill 52 and tribal cultural resources are discussed in Section 18, *Tribal Cultural Resources*.

Measure 9.H.3: Project conditions. The City shall require appropriate land use controls on projects that may endanger or destroy historic and pre-historic artifacts. Such controls include addition of fill to prevent disruption of site by grading, and site planning to avoid disturbance on sensitive portions of the site.

Measure 9.H.5: Ordinance. The City shall enforce the historic preservation ordinance.

CITY OF WATSONVILLE MUNICIPAL CODE

Chapter 8-13 of WMC establishes the City's ordinance for the preservation of historical, architectural, and aesthetic resources. Chapter 8-13 establishes the powers and duties of the Planning Department and the Planning Commission to designate historic structures, review and decide on permit applications for the alteration or demolition of historic structures, and procedures to take to encourage the preservation of historic structures.

Impacts Assessment

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

The project site is currently mostly developed with existing County offices and surface parking. As determined in the Cultural Resources Assessment Report (on file at County Department of Community Development & Infrastructure offices located at 701 Ocean Street, 4th Floor, Santa Cruz), the existing buildings within the project site are recommended ineligible for listing in the National Register of Historic Places and the California Register of Historical Resources. Therefore, the site does not contain historic resources or structures. The closest potential historic resource is the Watsonville Historic District as recorded by JRP Historical Consulting Services in 1999. However, as discussed above in *Existing Setting*, no formal evaluation has been prepared, and the district is not listed on the National Register of Historic Places, the California Register of Historical Resources, or the Watsonville Historic Register. Development facilitated by the project would not impact the potential historic district. Further, the nearest historical buildings are approximately 0.5 mile from the project site, and implementation of the project would not result in a substantial adverse change in the significance of a historical resource. Accordingly, the proposed project would have no impact on historic resources pursuant to *CEQA Guidelines* Section 15064.5.

NO IMPACT

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*
- c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

As described above in the *Existing Setting*, although there are no known records of cultural resources at the site, the project site is considered sensitive for archaeological resources. While the potential to encounter human remains on-site would also be low due to past disturbance of soil layers and because grading and excavation would be limited in depth to that necessary for building foundations and utility trenching, there is always a possibility of encountering unrecorded archaeological resources or human remains when conducting subsurface earthwork activities.

Development of the proposed project would require ground disturbance, such as grading and excavation. Construction activities would have the potential to encounter buried or subsurface pre-

historic resources, as well as human remains. Damage or destruction of archaeological resources and human remains, if present, would be a potentially significant impact. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce this impact to a less than significant level.

Mitigation Measures

CUL-1 Archaeological and Native American Monitoring

During ground disturbance of native soils (soils not consisting of artificial fill) for the construction of the project, a qualified archaeologist working under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) and a locally affiliated Native American monitor shall be retained to observe construction activities within the project site. If, during initial monitoring, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources, the qualified archaeologist, in consultation with the Native American monitor, may recommend that monitoring be reduced or eliminated. If cultural resources are identified during initial monitoring, work within 50 feet of the find shall halt and Mitigation Measure CUL-2 shall be implemented.

CUL-2 Unanticipated Discovery of Archaeological Resources

If archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983), shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

If archaeological resources of Native American origin are identified during project construction, a qualified archaeologist shall consult with the County to begin Native American consultation procedures. As part of this process, it may be determined that archaeological monitoring is required. A Native American monitor may also be required in addition to the archaeologist.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

According to the California Energy Commission (CEC), California’s total statewide electricity consumption was approximately 274,484 gigawatt-hours (GWh) in 2020. Approximately 1,180 GWh of electricity were consumed in Santa Cruz County, of which approximately 610 GWh (52 percent) were consumed by the non-residential sector (CEC 2020a; 2020b). Total natural gas consumption in 2020 was approximately 13.158 billion therms statewide, and 52 million therms in Santa Cruz County. Natural gas consumption for the non-residential sector in Santa Cruz County comprised approximately 19 million therms, or 37 percent of the County’s total consumption (CEC 2020c; 2020d).

The CEC provides full forecasts for electricity, natural gas, and fuel every two years as part of the Integrated Energy Policy Report Process. In 2030, it is estimated that Californians will consume up to 321,300 GWh of electricity and 13.241 billion therms of natural gas (CEC 2019). Gasoline demand is projected to decline each year through 2030 due to greater numbers of zero-emission vehicles and increasing fuel economy, with forecasted 2030 gasoline demand of up to 12.6 billion gallons; diesel demand is projected to increase modestly, following economic growth, to approximately 4.0 billion gallons in 2030 (CEC 2018a).

California’s electric grid relies increasingly on clean sources of energy such as solar, wind, geothermal, hydroelectricity, and biomass. As this transition advances, the grid is also expanding to serve new sectors including electric vehicles, rail, and space and water heating. California has installed more renewable energy than any other U.S. state with 22,250 megawatts (MW) of utility-scale systems operational today (CEC 2018b). California’s Renewables Portfolio Standard (RPS) is among the most ambitious energy policies in the nation, requiring utilities to produce 33 percent of their retail electricity from clean, renewable sources by 2020 and 50 percent by 2030. Increasing California’s renewable supplies will diminish the state’s dependence on fossil fuels for electric power generation.

Pacific Gas and Electric Company (PG&E) transmits and delivers electricity and natural gas to residents and businesses in the City of Watsonville, including the project site. Watsonville is also

served by Central Coast Community Energy (3CE), a community choice energy agency established by local communities which transmits a greater percentage of renewable energy via PG&E transmission lines. Residents and businesses may opt out and continue to receive electricity from PG&E. PG&E's 2018 power mix included 39 percent from renewable sources, 34 percent from nuclear, 15 percent from natural gas and other fuels, and 13 percent from large hydropower plants (PG&E 2020). Existing energy consumption on the project site includes consumption of fossil fuels in operation of the existing building and fuel use associated with vehicles traveling to and from the site.

Regulatory Setting

State

CALIFORNIA CODE OF REGULATIONS

At the state level, the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (CCR), promote efficient energy use in new buildings constructed in California. The standards regulate energy consumed for heating, cooling, ventilation, water heating, and lighting.

THE CALIFORNIA GREEN BUILDING STANDARDS CODE

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for new construction (new buildings and expansions) in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of minimum guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels. Building Energy Efficiency Standards and CALGreen standards are enforced through the local building permit process.

CALIFORNIA PUBLIC UTILITIES COMMISSION'S CALIFORNIA LONG TERM ENERGY EFFICIENCY STRATEGIC PLAN

The California Public Utilities Commission's (CPUC's) Long Term Energy Efficiency Strategic Plan presents a single roadmap to achieve maximum energy savings across all major groups and sectors in California. This comprehensive Plan for 2009 to 2020 is the state's first integrated framework of goals and strategies for saving energy, covering government, utility, and private sector actions, and holds energy efficiency to its role as the highest priority resource in meeting California's energy needs (CPUC 2011).

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the Santa Cruz County General Plan contains programs and policies to maximize conservation and efficient use of energy and encourage the development of locally available renewable energy resources. Policies 5.17.1 through 5.17.3 and Policy 5.17.5, below, include promotion of renewable energy, environmentally sound design, maximizing solar access, and retrofit and weatherization programs (County of Santa Cruz 1994).

Policy 5.17.1. Promote Alternative Energy Sources. Promote the use of energy sources which are renewable, recyclable and less environmentally degrading than non-renewable fossil fuels.

Policy 5.17.2. Design Structures for Solar Gain. Require the incorporation of environmentally sound active and passive heating and cooling and/or natural daylighting design principles in the location and construction of all new buildings and in the renovation and remodeling of existing buildings.

Policy 5.17.3. Solar Access. Encourage maximum solar access orientation in siting new development and require the protection of solar access in existing development.

Policy 5.17.5. Weatherization Improvements. Require energy efficiency and weatherization improvements in existing and new development including insulation, water conservation techniques, and encourage the installation of solar heating systems. Require a retrofit to meet energy efficiency standards upon sale or transfer of ownership.

SANTA CRUZ COUNTY CLIMATE ACTION STRATEGY

Santa Cruz County adopted a Climate Action Strategy (CAS) in 2013. The CAS outlines a course of action to reduce GHG emissions produced by governmental operations and community activities within Santa Cruz County. The CAS articulates a broad strategy for reaching emission reduction goals, and then goes further to identify the individual programs, policies, and initiatives that, together, will move County operations and the community toward the goals. Strategies are included to reduce emissions in the major focus areas of transportation, energy, and solid waste (County of Santa Cruz 2013). The CAS is not a certified climate action plan for CEQA compliance.

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville General Plan Environmental Resource Management outlines goals, policies, and implementation measures to guide planning and development practices within the City. The following goal, policy, and measure outline the City's energy goals and policies as they pertain to the sustainable utilization of energy resources within the City (City of Watsonville 1994).

Goal 9.12: Energy. Promote the conservation of energy and the use of alternative energy resources in transportation and residential, commercial, and industrial development.

Policy 9.J: Energy. The City shall strive to reduce non-renewable energy resource consumption and promote the use of alternative energy resources.

Measure 9.J.2: Development. The City shall encourage energy efficient design and design which utilizes solar opportunities in residential, commercial, and industrial development.

Measure 9.J.3: Land use and transportation. Development shall be encouraged to occur in locations and at intensities that facilitate the use of alternative transportation modes to the extent compatible with the community.

CITY OF WATSONVILLE MUNICIPAL CODE

Watsonville Municipal Code includes regulations associated with energy efficiency and energy use. Pursuant to Section 8-15.01, the City adopted CALGreen, which establishes mandatory green building standards for new construction. Further, pursuant to Section 6-3.801, the City adopted the Model Water Efficient Landscape Ordinance established by California Code of Regulations Sections 490 through 495, which regulates landscaping and irrigation design to minimize water and energy usage.

CITY OF WATSONVILLE 2030 CLIMATE ACTION AND ADAPTATION PLAN

The City of Watsonville 2030 Climate Action and Adaptation Plan (CAAP), adopted in October 2021, establishes several programs that are designed to reduce the City’s greenhouse gas emissions to 80 percent lower than 1990 levels over the next 10 years, consistent with statewide goals. The CAAP includes climate action, adaptation, and restoration initiatives and focuses on reducing emissions from transportation, natural gas, electricity use, and food waste disposal. CAAP strategies and programs include requirements for all new buildings to be all-electric (City of Watsonville 2021a).

Impacts Assessment

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Construction

Construction of the project would require nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment, and other resources including, but not limited to, lumber, sand, gravel, asphalt, metals, and water. Construction would consume energy used for construction equipment and other activities at the project site (e.g., grading, building construction, paving), in addition to the energy used to manufacture the equipment, materials, and supplies and transport them to the project site.

Total project consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod (Appendix B). Table 6 summarizes the estimated energy consumption for construction of the project. Project construction, including construction equipment operation, hauling trips, and vendor trips, would consume an estimated 114,730 gallons of diesel. Worker trips would consume an estimated 23,604 gallons of petroleum fuel during project construction. Energy consumption calculations are provided in Appendix D.

Table 6 Estimated Fuel Consumption during Construction

Fuel Type	Gallons	MMBtu ⁴
Diesel Fuel (Construction Equipment) ¹	114,333	14,573
Diesel Fuel (Hauling & Vendor Trips) ²	397	51
Other Petroleum Fuel (Worker Trips) ³	23,604	2,591
Total		17,215

¹ Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment’s horsepower, the equipment’s load factor, and the equipment’s fuel usage per horse power per hour of operation, which are all taken from CalEEMod outputs (see Appendix B), and from compression-ignition engine brake-specific fuel consumptions factors for engines between 0 to 100 horsepower and greater than 100 horsepower. Fuel consumed for all construction equipment is assumed to be diesel fuel.

² Fuel demand rate for hauling and vendor trips (cut material imports) is derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from “Trips and VMT” Table contained in Section 3.0, *Construction Detail*, of the CalEEMod results (see Appendix B). The fuel economy for hauling and vendor trip vehicles is derived from the United States Department of Transportation. Fuel consumed for all hauling trucks is assumed to be diesel fuel.

³ The fuel economy for worker trip vehicles is derived from USDOT National Transportation Statistics (24.4 miles per gallon). Fuel consumed for all worker trips is assumed to be gasoline fuel.

⁴ CaRFG CA-GREET 2.0 fuel specification of 109,786 British thermal units per gallon used to identify conversion rate for fuel energy consumption for worker trips specified above (CARB 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 British thermal

units per gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above (CARB 2015).
 Totals may not add up due to rounding.
 Source: Appendix D

Construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites because the project involves typical building construction. It is also reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. In addition, energy demand associated with project construction would be temporary and typical of similar office and residential projects. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction-related energy impacts would be less than significant.

Operation

Project operation would increase energy demand in the form of gasoline consumption and electricity. The project would not increase demand for natural gas as the existing County health services uses natural gas, and other existing uses that are currently on site do so as well. The residential component would not involve or use natural gas which is prohibited in the City of Watsonville in new residential construction. Increased gasoline consumption would be associated with new residential and employee vehicle trips generated from the project. The estimated of number of daily trips that would be generated by the project is based on default values generated by CalEEMod (Appendix B). The default trip generation rates exceed the traffic rates specified in the Transportation Analysis prepared for the project by Hexagon Transportation Consultants, Inc., which is provided as Appendix C to this Initial Study. Therefore, using the default trip generation rates provides a conservative estimate of energy use and operational gasoline consumption. In addition, there would be indirect electricity usage associated with the conveyance of water supplied to the project and wastewater produced by the project. Table 7 shows the estimated total annual energy consumption associated with operation of the project.

Table 7 Estimated Annual Operational Energy Consumption

Energy Source	Consumption	Consumption in MMBtu
Gasoline Fuel (Gallons)	298,790	32,803
Diesel Fuel (Gallons)	52,769	6,726
Natural Gas (kBtu)	2,678,070	2,678
Electricity (kWh)	3,274,879	11,174
Total		50,381

Notes: Totals may not add up due to rounding.
 Source: Appendix D

As shown in Table 7, vehicles associated with the operation of the project would consume approximately 298,790 gallons of gasoline and 52,769 gallons of diesel fuel, or approximately 39,529 MMBtu, each year. The fuel consumed by the project would be typical of residential and office projects.

In addition to transportation energy use, project operation would require permanent grid connections for electricity. Approximately 3,274,879 kilowatt-hours of electricity per year would be

required from 3Ce and PG&E and would be used for lighting, appliance usage, and heating. As discussed under *Existing Setting*, annual electricity used in Santa Cruz County in 2020 was approximately 1,180 GWh. The approximately 3,274,879 kilowatt-hours per year of electricity consumed by the proposed project would be less than 0.003 percent of the total energy use in Santa Cruz County. Therefore, the electricity use of the proposed project would not be excessive or wasteful and would be typical of new residential and office development in Watsonville.

The project would be required to comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen (California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. These standards ensure new construction does not result in wasteful, inefficient, or unnecessary consumption of energy.

Overall, project operation would result in consumption of fuels from primarily from vehicle trips and electricity. Project energy consumed would represent an incremental increase in energy usage compared to existing conditions, but the project would be required to implement energy-efficient components to reduce energy demand consistent with CalGreen. Therefore, operational energy impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The County’s Climate Action Strategy and the City of Watsonville’s CAAP establishes several programs or policies that are designed to reduce energy consumption and implement more energy-efficient practices. For example, the County’s Climate Action Strategy includes strategies to increase energy efficiency, and local renewable energy generation. Project consistency with applicable policies and strategies with these two climate action documents is evaluated in Table 8 and Table 9. The County of Santa Cruz General Plan and City of Watsonville General Plan and the also contain goals and policies related to energy efficiency and consumption. Each of these planning documents incorporate State plans for renewable energy or energy efficiency by nature. Project consistency with applicable energy policies of the County’s General Plan and City’s General Plan is presented in Table 10 and Table 11, respectively.

Table 8 Project Consistency with the County of Santa Cruz Climate Action Strategy

Strategy	Consistency
Strategy E-2. Increase energy efficiency in new and existing buildings and facilities.	Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards.
Strategy E-8. Reduce energy use for water supply through water conservation strategies.	Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards.
Strategy E-4.10. Increase renewable energy generation on other County facilities, as feasible (ongoing).	Consistent. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, in accordance with the 2019 Building Energy Efficiency Standards. The installation of solar panels would allow for the production of renewable energy.
Strategy T-1. Reduce vehicle miles traveled (VMT) through County and regional long range planning efforts.	Consistent. As explained fully in Section 17, <i>Transportation</i> , the project would not exceed County VMT thresholds.

Strategy	Consistency
Strategy T-3. Provide infrastructure to support zero and low emissions vehicles (plug in, hybrid plug-in vehicles).	Consistent. The proposed project would include parking for electric vehicles that feature charging machines.
Strategy T-1.10. Ensure that development projects contain measures that enhance multi-modal transportation options (ongoing).	Consistent. Development facilitated by the project would be served by existing pedestrian facilities, bike lanes, and an existing Santa Cruz METRO transit stop on Freedom Boulevard, which would promote multi-modal transportation options to and from the project site.

Source: County of Santa Cruz 2013

Table 9 Project Consistency with the Watsonville 2030 Climate Action & Adaptation Plan

Measure	Consistency
Measure T2-A. New pedestrian improvements. Require new development projects, residential and nonresidential, to provide pedestrian improvements along street frontages; and strongly encourage connection to the nearest existing pedestrian facilities, such as sidewalks or trails. Developments shall also include internal pedestrian connections between all uses.	Consistent. Development facilitated by the project would include internal pedestrian walkways that would connect to existing pedestrian facilities alongside Freedom Boulevard, Crestview Drive, and Madison Street.
Measure E1-A. Natural gas reduction in new development. Require a 50 percent reduction in natural gas consumption compared to BAU in all new development through electric-only development and installation of electric or more efficient natural gas home heating and cooling systems, appliances, or water heaters. Explore implementation of an all-electric ordinance to achieve all electric new development by 2030.	Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, equal to the expected electricity usage, in accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards. The residential component of the project would not require or use natural gas.

Source: City of Watsonville 2021a

Table 10 Project Consistency with the County of Santa Cruz General Plan

Policy	Consistency
Policy 5.17.1. Promote alternative energy sources. Promote the use of energy sources which are renewable, recyclable, and less environmentally degrading than non-renewable fossil fuels.	Consistent. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, in accordance with the 2019 Building Energy Efficiency Standards.
Policy 5.17.2. Design structures for solar gain. Require the incorporation of environmentally sound active and passive heating and cooling and/or natural daylighting design principles in the location and construction of all new buildings and in the renovation and remodeling of existing buildings.	Consistent. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, in accordance with the 2019 Building Energy Efficiency Standards.

Policy	Consistency
Policy 5.17.3. Solar access. Encourage maximum solar access orientation in siting new development, and require protection of solar access in existing development.	Consistent. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, in accordance with the 2019 Building Energy Efficiency Standards.
Source: County of Santa Cruz 1994	

Table 11 Project Consistency with the City of Watsonville General Plan

Policy/Measure	Consistency
Measure 9.J.1. Alternative transportation. As outlined in the Transportation and Circulation chapter, the City shall promote the use and development of alternative transportation modes intended to reduce the consumption of fossil fuels and other non-renewable energy resources.	Consistent. Development facilitated by the project would be served by existing pedestrian facilities, bike lanes, and an existing Santa Cruz METRO transit stop on Freedom Boulevard, which would promote multi-modal transportation options to and from the project site.
Measure 9.J.2. Development. The City shall encourage energy efficient design and design which utilizes solar opportunities in residential, commercial, and industrial development.	Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, in accordance with the 2019 Building Energy Efficiency Standards.
Measure 9.J.3. Land use and transportation. Development shall be encouraged to occur in locations and at intensities that facilitate the use of alternative transportation modes to the extent compatible with the community.	Consistent. Development facilitated by the project would be served by existing pedestrian facilities, bike lanes, and an existing Santa Cruz METRO transit stop on Freedom Boulevard, which would facilitate the use of alternative transportation.
Source: City of Watsonville 1994	

As shown in Table 8 through Table 11, the proposed project would not conflict with the energy-related policies of the County’s and City’s climate plans and General Plans. The proposed project would also be required to comply with the energy standards in the California Building Energy Efficiency Standards. Compliance with these regulations would avoid potential conflicts with adopted energy conservation plans. Therefore, the project would have a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	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:				
1. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Regional Geology

The project site is in the Pajaro Valley, which encompasses approximately 120 square miles across southern Santa Cruz County and northern Monterey County. Pajaro Valley is bordered by the Santa Cruz Mountains to the east and the Pacific Ocean to the west. Coastal mountain ranges such as the Santa Cruz Mountains are comprised of northwesterly trending mountain ranges and structural valleys formed by tectonic processes commonly found around the Circum-Pacific belt. Geologic deposits within the Pajaro Valley range in age from Pliocene to Holocene, including (from oldest to youngest) the Purisma Formation, Aromas Red Sands of Allen, terrace deposits, alluvium, and dune sand (United States Geological Survey 2019).

The project site is located within the Coast Ranges geomorphic province, one of the most seismically active regions in the country. The Coast Ranges consist of generally northwest-trending mountain ranges and valleys which run subparallel to the San Andreas Fault. (California Geological Survey 2002). The nearest faults to the project site are the Zayante Fault, located approximately 1.5 miles northeast; the San Andreas Fault, located approximately 4.3 miles northeast; and Sargent Fault, located approximately 7 miles northeast (DOC 2019).

On-Site Soils and Geology

Based on information obtained from the United States Department of Agriculture, Natural Resources Conservation Service Web Soil Survey online database, the project site is mapped as Watsonville loam, 2 to 15 percent slopes. Watsonville loam consists of deep, poorly-drained clayey to sandy clayey loam, formed in marine terraces (United States Department of Agriculture 2021).

Liquefaction occurs when loose sand and silt behaves like a liquid and loses its ability to support structures; it is caused by a complete loss of strength when the effective stress of soil particles drops to zero. The project site and the surrounding area are not located within a mapped liquefaction zone (DOC 2022).

Regulatory Setting

State

CALIFORNIA BUILDING CODE

The California Building Code (CBC) provides the standards for building design by providing the minimum design criteria for building with respect to seismic safety. The California Division of Occupational Safety and Health (Cal/OSHA) regulations specify additional safety standards for excavation, shoring, and trenching (Title 8 of the California Code of Regulations).

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act's is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act only addresses the hazard of surface fault rupture and requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Regulation of development projects within the zones is the responsibility of the local agencies.

SEISMIC HAZARDS MAPPING ACT

The Seismic Hazards Mapping Act of 1990 requires that seismic hazard zones are identified and mapped to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes.

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the Santa Cruz County General Plan and Local Coastal Program contains the following objective and policy applicable to the project and paleontological resources (Santa Cruz County 1994):

Objective 5.9. Hydrological, Geological, and Paleontological Resources. To protect hydrological, geological and paleontological resources which stand out as rare or unique and representative in Santa Cruz County because of their scarcity, scientific or educational value, aesthetic quality or cultural significance.

Policy 5.9.1. Protection and Designation of Significant Resources. Protect significant geological features such as caves, large rock outcrops, inland cliffs and special formations of scenic or scientific value, hydrological features such as major waterfalls or springs, and paleontological features, through the environmental review process. Designate such sites on the General Plan and Local Coastal Program Resources and Constraints Maps where identified. Currently identified sites of Significant Hydrological, Geological and Paleontological Features are as follows:

Bonny Doon Planning Area:

- (a) Majors Creek Canyon: The cliffs and exposed rocks of this canyon to the east of Highway 1 are outstanding scenic features.
- (b) Martin Road: East and west of Martin Road, encompassed in the botanical sites, are unusual sandhill outcroppings.
- (c) Wilder Creek: This area contains a concentration of limestone caves worth protecting.
- (d) Table Rock: Highly scenic coastal rock formations (sedimentary intrusive bodies) can be found in the vicinity of Table Rock and Yellow Bank Creek.

The Public Safety Element of the Santa Cruz County General Plan and Local Coastal Program contains the following objectives and policies applicable to the project and related to seismic hazards, geologic and slope hazards, and soil erosion:⁵

Objective 6.1. Seismic Hazards. To reduce the potential for loss of life, injury and property damage resulting from earthquakes by: regulating the siting and design of development in seismic hazard areas; encouraging open space, agricultural or low density land use in the fault zones; and increasing public information and awareness of seismic hazards.

Policy 6.1.1. Geologic Review for Development in Designated Fault Zones. Require a review of geologic hazards for all discretionary development projects, including the creation of new lots, in designated fault zones. Fault zones designated for review include the Butano, Sargent.

⁵ Recent amendments to the General Plan affecting these objectives and policies are currently pending certification by the California Coastal Commission.

Zayante, and Corralitos complexes, as well as the State designated Seismic Review Zones. Required geologic reviews shall examine all potential seismic hazards and may consist of a Geologic Hazards Assessment and a more complete investigation where required. Such assessment shall be prepared by County staff under supervision of the County Geologist or a certified engineering geologist may conduct this review at the applicant's choice and expense.

Policy 6.1.4. Site Investigation Regarding Liquefaction Hazard. Require site-specific investigation by a certified engineering geologist and/or civil engineer of all development proposals of more than four residential units in areas designated as having a high or very high liquefaction potential. Proposals of four units and under and non-residential projects shall be reviewed for liquefaction hazard through environmental review and/or geologic hazards assessment, and when a significant potential hazard exists a site-specific investigation shall be required.

Policy 6.1.5. Location of New Development Away from Potentially Hazardous Areas. Require the location and/or clustering of development away from potentially hazardous areas where feasible and condition development permits based on the recommendations of the site's Hazard Assessment or other technical reports.

Objective 6.2. Slope Stability. To reduce safety hazards and property damage caused by landslides and other ground movements affecting land use activities in areas of unstable geologic formations, potentially unstable slopes and coastal bluff retreat.

Policy 6.2.1. Geologic Hazards Assessments for Development On and Near Slopes. Require a geologic hazards assessment of all development, including grading permits, that is potentially affected by slope instability, regardless of the slope gradient on which the development takes place. Such assessment shall be prepared by County staff under supervision of the County Geologist, or a certified engineering geologist may conduct this review at the applicant's choice and expense.

Policy 6.2.2. Engineering Geology Report. Require an engineering geology report by a certified engineering geologist and/or a soils engineering report when the hazards assessment identifies potentially unsafe geologic conditions in an area of proposed development.

Policy 6.2.3. Conditions for Development and Grading Permits. Condition development and grading permits based on the recommendations of the Hazard assessment and other technical reports.

Policy 6.2.4. Mitigation of Geologic Hazards and Density Considerations. Deny the location of a proposed development or permit for a grading project if it is found that geologic hazards cannot be mitigated to within acceptable risk levels; and approve development proposals only if the project's density reflects consideration of the degree of hazard on the site, as determined by technical information.

Objective 6.3. Erosion. To control erosion and siltation originating from new and existing cannabis activity and related development, in order to reduce damage to soil, water, and biotic resources.

Policy 6.3.2. Grading Projects to Address Mitigation Measures. Deny any grading project where a potential danger to soil or water resources has been identified and adequate mitigation measures cannot be undertaken.

Policy 6.3.3. Abatement of Grading and Drainage Problems. Require, as a condition of development approval, abatement of any grading or drainage condition on the property which gives rise to existing or potential erosion problems.

Policy 6.3.4. Erosion Control Plan Approval Required for Development. Require approval of an erosion control plan for all development, as specified in the Erosion Control ordinance. Vegetation removal shall be minimized and limited to that amount indicated on the approved development plans, but shall be consistent with fire safety requirements.

Policy 6.3.5. Installation of Erosion Control Measures. Require the installation of erosion control measures consistent with the Erosion Control ordinance, by October 15, or the advent of significant rain, or project completion, whichever occurs first. Prior to October 15, require adequate erosion control to be provided to prevent erosion from early storms. For development activities, require protection of exposed soil from erosion between October 15 and April 15 and require vegetation and stabilization of disturbed areas prior to completion of the project. For agricultural activities, require that adequate measures are taken to prevent excessive sediment from leaving the property.

Policy 6.3.7. Reuse of Topsoil and Native Vegetation Upon Grading Completion. Require topsoil to be stockpiled and reapplied upon completion of grading to promote regrowth of vegetation; native vegetation should be used in replanting disturbed areas to enhance long-term stability.

Policy 6.3.8. On-Site Sediment Containment. Require containment of all sediment on the site during construction and require drainage improvements for the completed development that will provide runoff control, including onsite retention or detention where downstream drainage facilities have limited capacity. Runoff control systems or Best Management Practices shall be adequate to prevent any significant increase in site runoff over pre-existing volumes and velocities and to maximize on-site collection of non-point source pollutants.

Policy 6.3.9. Site Design to Minimize Grading. Require site design in all areas to minimize grading activities and reduce vegetation removal based on the following guidelines:

- (a) Structures should be clustered;
- (b) Access roads and driveways shall not cross slopes greater than 30 percent; cuts and fills should not exceed 10 feet, unless they are wholly underneath the footprint and adequately retained;
- (c) Foundation designs should minimize excavation or fill;
- (d) Building and access envelopes should be designated on the basis of site inspection to avoid particularly erodable areas;
- (e) Require all fill and sidecast material to be recompacted to engineered standards, reseeded, and mulched and/or burlap covered.

Policy 6.3.10. Land Clearing Permit. Require a land clearing permit and an erosion control plan for clearing one or more acres, except when clearing is for existing agricultural uses. Require that any erosion control and land clearing activities be consistent with all General Plan and Local Coastal Program Land Use Plan policies.

SANTA CRUZ COUNTY CODE

The Santa Cruz County Code Chapter 16.10 pertains to geologic hazards in the County.⁶ The purpose of Chapter 16.10, regarding geologic hazards, is to implement the policies of the State of California Alquist-Priolo Earthquake Fault Zoning Act and the County's General Plan, and to minimize injury, loss of life, and damage to property caused by the natural physical hazards of earthquakes, floods,

⁶ Recent amendments to the Zoning Ordinance are currently pending certification by the California Coastal Commission.

landslides, and coastal processes. Chapter 16.10 sets forth regulations and review procedures for development and construction activities within mapped geologic hazards areas.

Chapter 16.20 of the Santa Cruz County Code contains the County's grading regulations. The purpose of Chapter 16.20 is to safeguard health, safety, and the public welfare; to minimize erosion and the extent of grading; to protect fish and wildlife; to protect the watersheds; to ensure the natural appearance of grading projects; and to otherwise protect the natural environment of Santa Cruz County. The chapter sets forth rules and regulations to control all grading, including excavations, earthwork, road construction, dredging, diking, fills and embankments; establishes the administrative procedure for issuance of permits; and provides for approval of plans and inspections. Section 16.20.140 provides the design standards for excavation such as cut slopes. Cut slopes shall be no steeper than one and one-half horizontal to vertical unless approved by the Planning Director. No vegetation removal or grading pursuant to a permit will be allowed that will result in erosion. Section 16.20.150 provides design standards for fill slopes. Fills shall not be constructed on natural slopes steeper than two to one unless a civil engineer devises a method of placement which will assure the fill will remain in place.

Santa Cruz County Code Chapter 16.22 is designed to prevent accelerated erosion. Under Section 16.22.040 of the County Code, no person shall allow for the continued existence of condition on any site that is likely to cause accelerated erosion. Chapter 16.22 requires projects to have an erosion control plan, implement measures adequate to control runoff from a 10-year storm, and establish vegetation that controls erosion in order to obtain approval for land clearing activities. Section 12.10.215 of the County Code adopts by reference (with specified amendments) the 2019 CBC, which incorporates seismic design standards for structures.

Santa Cruz County Code Chapter 16.44 is designed to protect paleontological resources. Section 16.44.040 requires preparation of a paleontological survey for the following development resulting in ground disturbance or certain shoreline projects that are in areas of known paleontological resources as shown on the paleontological resource protection maps. A paleontological report shall be required if the County Environmental Coordinator determines, based on the paleontological survey, that further information is required to ensure protection of paleontological resources. Where environmental review of a development project is also required by the Santa Cruz County environmental review guidelines, the paleontological survey or report shall be incorporated into the environmental review procedures established therein. Pursuant to Section 16.44.060, in granting the required permit(s) for a project on the site of a significant paleontological resource, the Planning Director shall attach reasonable conditions to ensure compliance with the purposes of this chapter. Such conditions could include but are not limited to, having a qualified paleontologist approved by the County present to observe, to examine and to evaluate the site during ground disturbing development activities; and to convey fossil finds to an appropriate museum or research institute. Pursuant to Section 16.44.070, after a development permit has been issued, if the paleontologist determines from observation and examination during development activities that significant paleontological resources exist on the project site that were not identified in the paleontological survey or report, then the paleontologist shall notify the property owner and developer and the Planning Director. The project developer, upon notification, shall immediately cease and desist from excavation or disturbance of the project site, and shall allow inspection of the site by the Planning Director.

COUNTY OF SANTA CRUZ LOCAL HAZARD MITIGATION PLAN 2021-2026

The County of Santa Cruz Local Hazard Mitigation Plan identifies potential hazards in the County, including geologic hazards such as earthquakes, landslides, liquefaction, erosion, and tsunami hazards. The purpose of hazard mitigation is to implement and sustain actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Mitigation actions include both short-term and long-term activities that reduce the impacts of hazards, reduce exposure to hazards, or reduce effects of hazards through various means, including preparedness, response, and recovery measures. Effective mitigation actions also reduce the adverse impacts and cost of future disasters (County of Santa Cruz 2021).

CITY OF WATSONVILLE GENERAL PLAN

The City of Watsonville General Plan outlines goals and policies to guide planning and development practices within the City. The General Plan outlines the City's goals, policies, and implementation measures as they pertain to environmental hazards and considerations. Those included (below) are applicable to the project's geology and soils (City Watsonville 1994).

Goal 12.2: Land use safety. Plan for and regulate the uses of land in order to provide a pattern of urban development that will minimize exposure to hazards from either natural or human-related causes.

Policy 12.C: Land use safety. The City shall take all appropriate actions to ensure that current land use activities and new developments are mitigated to prevent soil failure and other soil-related dangers.

Measure 12.C.1: Risk mitigation. The City shall identify and mitigation to an acceptable level of risk new development proposed in areas with geologic, seismic, flood, and other environmental constraints.

Measure 12.C.2: Soils investigation. The City shall require a soils investigation report prior to new development on sites deemed to have a high potential for soil erosion, landslide, or other soil-related constraints.

Measure 12.C.3: Foundation design. The City shall require that new development provide for appropriate foundation design to comply with city building standards and recommendations of the soils investigation.

WATSONVILLE MUNICIPAL CODE

WMC requires the preparation of a geotechnical report to obtain a building permit, in addition to other materials determined to be necessary by the City's Building Official (WMC Section 8-1.105). Pursuant to WMC Section 8-1.101, the City of Watsonville adopted the CBC or California Code of Regulations Title 24, Part 2, with amendments into the City's municipal code. The CBC requires, among other things, seismically resistant construction and foundation and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities and requires the implementation of erosion control measures.

Impacts Assessment

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

- a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- a.3. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*
- c. *Would the project 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?*

The nearest Alquist-Priolo fault zone to the project site is the Zayante Fault Zone, located approximately 1.5 miles northeast of the project site (DOC 2019). Further, according to maps prepared by the DOC, the project site is not located within a known liquefaction zone (DOC 2022), or an area known to be susceptible to landslides (DOC 2020). While no faults, liquefaction zones, or landslide areas have been mapped within the city itself, the city and surrounding areas could still experience damage from earthquakes due to the high seismic shaking within the Coast Ranges geomorphic province. The development envisioned in the proposed Master Plan and occupants of the development would therefore be subject to risk of damage or injury during earthquake events.

A geotechnical investigation would be prepared for development facilitated by the project pursuant to Santa Cruz County Code, which would identify site-specific geologic and soil conditions. The geotechnical investigation would make recommendations to avoid and minimize risks related to potential existing geologic and soil hazards within the project site. The County adopted the CBC and incorporated into the Santa Cruz County Code Section 12.10. Section 12.10.215 of the Santa Cruz County Code states that the Santa Cruz County Planning Department shall approve the soil investigation if it determines that the recommended action is likely to prevent structural damage in each structure. Further, as a condition of the building permit, the approved recommended action shall be incorporated in the construction of each structure. Therefore, pursuant to Santa Cruz County Code and the CBC, the measures of the geotechnical investigation would be incorporated into the design of the County health services building(s) and the residential building(s). Potential substantial adverse effects associated with ground shaking, liquefaction, lateral spreading, or collapse would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Grading and site preparation associated with project construction would remove vegetation cover and impervious surfaces, such as parking areas. Project grading would also loosen soils. The removal of soil cover and loosening of the soils would increase the potential for erosion and loss of topsoil. Because the project would disturb more than one acre of land, it would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (Construction General Permit), administered by the State Water Resources Control Board (SWRCB). Section 10, *Hydrology and Water Quality*, describes how coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Plan (SWPPP) and various best management practices (BMP) to reduce erosion and loss

of topsoil during site construction. Santa Cruz County Code Chapter 16.2 provides direction concerning erosion control, including keeping debris and dirt out of storm drain systems during construction, requiring submittal of a SWPPP, and requiring low impact development strategies or structural treatment control BMPs. Compliance with the NPDES permit and identified BMPs and with appropriate sections of the Santa Cruz County Code would ensure impacts from erosion would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils have the potential to cause damage to structures through soil movement as the soil changes volume in response to changes in the water content. The project site is underlain by Watsonville loam, poorly drained clayey to sandy clayey loam, which has low shrink-swell potential (United States Department of Agriculture 2021). Santa Cruz County Code Section 16.10.050 requires preparation of a geotechnical investigation that identifies and provides recommendations for expansive soils. Section 16.10.070 of Santa Cruz County Code requires that the recommendations made within a geologic hazards assessment or full geologic report be included as permit conditions of any permit or approvals subsequently issued for development. Development facilitated by the project would also comply with the CBC as applicable, which would ensure construction on potentially expansive soils is designed to withstand potential soil movement. Therefore, potential impacts from expansive soils would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- e. *Would the project 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?*

Development envisioned in the proposed Master Plan would connect to the municipal wastewater system. The project would not require septic tanks or alternative wastewater disposal systems. Therefore, no impacts would occur.

NO IMPACT

- f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Paleontological resources include the fossilized remains, traces, or imprints of organisms preserved in or on the earth's crust. Paleontological sensitivity is defined based on the underlying geologic formation. Areas with the highest sensitivity are those where geologic formations known to contain fossils are found close to the ground surface. According to the Environmental Resource Management Element of the Watsonville General Plan, the Pajaro Valley and City's Planning Area has historically yielded an array of paleontological resources and will likely yield future discoveries (City of Watsonville 1994). Accordingly, there always exists a possibility of encountering paleontological resources when conducting subsurface earthwork activities for development facilitated by the project, such as excavation for installation of utilities. Therefore, impacts would be potentially significant, and mitigation is required. Mitigation Measure GEO-1 would apply to all stages of construction facilitated by the project and would provide for the recovery, identification, and curation of previously unrecovered fossils, thereby reducing impacts to paleontological resources to a less than significant level.

Mitigation Measures

GEO-1 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during project development, work in the immediate vicinity of the find shall be stopped, and a qualified professional paleontologist shall be retained to evaluate the discovery, determine its significance, and identify if mitigation or treatment is warranted. Significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository. Work around the discovery shall only resume once the find is properly documented and authorization is given to resume construction work.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

8 Greenhouse Gas Emissions

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Various gases in the atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). Human-caused emissions of these GHGs exceeding natural ambient concentrations are responsible for enhancing the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation.

Regulatory Setting

Federal

CLEAN AIR ACT

The U.S. Environmental Protection Agency (EPA) is the federal agency responsible for implementing the Clean Air Act (CAA). The United States Supreme Court in its 2007 decision in *Massachusetts et al. v. Environmental Protection Agency et al.* ruled that carbon dioxide (CO₂) is an air pollutant as defined under the CAA, and that EPA has the authority to regulate emissions of GHGs. Following the court decision, EPA has taken actions to regulate, monitor, and potentially reduce GHG emissions (primarily mobile emissions).

State

EXECUTIVE ORDER S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO 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 (CARB 2017b). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the “2006 CAT Report”). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions.

These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc. In April 2015, the governor issued EO B-30-15, calling for a new target of 40 percent below 1990 levels by 2030.

ASSEMBLY BILL 32

California’s major initiative for reducing GHG emissions is outlined in AB 32, the “California Global Warming Solutions Act of 2006,” signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 million metric tons CO₂e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures.

Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defines CARB’s climate change priorities for the next five years and sets the groundwork to reach post-2020 statewide goals. The update highlights California’s progress toward meeting the “near-term” 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluates how to align the State’s longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use (CARB 2017b).

SENATE BILL 32

On September 8, 2016, the governor signed SB 32 into law, extending AB 32 by requiring the further reduction of GHGs statewide to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as

implementation of recently adopted policies and policies, such as SB 350 and SB 1383 (see below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) CO₂e by 2030 and two MT CO₂e by 2050 (CARB 2017b). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State (CARB 2017b).

EXECUTIVE ORDER B-55-18

On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Regional

MONTEREY BAY AIR RESOURCES DISTRICT

MBARD, as the regional air agency for the Basin, has air-permitting authority in Santa Cruz, Monterey, and San Benito Counties. In February 2008, MBARD issued revised adopted guidance for assessing and reducing the impacts of project-specific air quality emissions: CEQA Air Quality Guidelines. This document included a reserved section to address project-specific GHG emissions: *Climate Change and Assessment of Project Impacts from Greenhouse Gases*. To date, MBARD has not adopted guidance for GHG emissions inventory, or established significance thresholds for GHG emissions.

ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

AMBAG is the Metropolitan Planning Organization (MPO) for the Monterey Bay Area. As the MPO, AMBAG is required to produce certain documents that maintain the region's eligibility for federal transportation assistance which include the Metropolitan Transportation Plan (MTP). AMBAG coordinates the development of the MTP with Regional Transportation Planning Agencies (Council of San Benito County Governments, Santa Cruz County Regional Transportation Commission, and Transportation Agency for Monterey County), transit providers (San Benito County Local Transit Authority, Monterey Salinas Transit, and Santa Cruz METRO Transit District), MBARD, state and federal governments, and organizations having interest in or responsibility for transportation planning and programming. AMBAG also coordinates transportation planning and programming activities with the three counties and 18 local jurisdictions within the tri-county Monterey Bay Region.

In 2022, AMBAG adopted the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy (2045 MTP/SCS). The 2045 MTP/SCS is built on a set of integrated policies, strategies, and investments to maintain and improve the transportation system to meet the diverse needs of the region through 2045. The 2045 MTP/SCS plans more focused growth in high quality transit corridors and more travel choices as well as a safe and efficient transportation system with improved access to jobs and education. The AMBAG region strives toward sustainability through integrated land use and transportation planning. The AMBAG region must achieve specific federal air quality standards

and is required by state law to lower regional GHG emissions. AMBAG was tasked by CARB to achieve a six percent decrease in mobile source GHG emissions compared to 2005 vehicle emissions by the end of 2035. Implementation of the 2045 MTP/SCS is anticipated to achieve a four percent per capita reduction by 2020 and a nearly seven percent per capita reduction by 2035 (AMBAG 2022).

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the County’s General Plan and Local Coastal Program includes Policy 5.18.9 for reducing GHG emissions and that is applicable to the proposed project. Policy 5.18.9 states:

Policy 5.18.9. Greenhouse Gas Reduction. Implement state and federal legislation promoting the national goal of 35 percent reduction of carbon dioxide and other greenhouse gases by 2000.

SANTA CRUZ COUNTY CLIMATE ACTION STRATEGY

Santa Cruz County adopted its CAS in 2013. The CAS outlines a course of action to reduce GHG emissions produced by governmental operations and community activities within unincorporated Santa Cruz County. The CAS articulates a broad strategy for reaching emission reduction goals, and then goes further to identify the individual programs, policies, and initiatives that, together, will move County operations and the community toward the goals. Strategies are included to reduce emissions in the major focus areas of transportation, energy, and solid waste (County of Santa Cruz 2013).

As described in the CAS, Santa Cruz County has already met the emissions target set by AB 32 of reducing GHG emissions to 1990 levels by 2020. The CAS also includes GHG emissions targets for the years 2035 and 2050. The emissions reduction policies of the CAS are organized into three topical areas: Energy Use, Transportation and Solid Waste.

CITY OF WATSONVILLE GENERAL PLAN

The City of Watsonville’s General Plan Environmental Resources Management and Transportation and Circulation Elements include the following goals, policies, and implementation measures pertaining to GHG emissions that are relevant to this analysis (City of Watsonville 1994):

Measure 9.C.9: Environmental review. The City shall use the environmental review process to determine both stationary source and transportation related potential air quality impacts for project proposals.

Policy 9.J: Energy. The City shall strive to reduce non-renewable energy resource consumption and promote the use of alternative energy resources.

Measure 9.J.1: Alternative transportation. As outlined in the Transportation and Circulation chapter, the City shall promote the use and development of alternative transportation modes intended to reduce the consumption of fossil fuels and other non-renewable energy resources.

WATSONVILLE CLIMATE ACTION PLAN

The City of Watsonville released a Climate Action Plan (CAP) in April 2015 that serves to reinforce the values included in the draft *Watsonville VISTA 2030 General Plan Update*, which has not been adopted because of litigation. The CAP encourages pedestrian and bicycle-friendly neighborhoods, increased transportation options, improved energy efficiency, reduced waste, increased recycling, and protection of open space. Watsonville is committed to achieving the 2020 target set by the State of California in AB 32; namely, to achieve 1990 levels by 2020. Based on state guidance, the 2020 target is calculated as 15 percent below 2005 levels by 2020. Furthermore, as indicated in the CAP, the city will continue the trajectory to reach the 2050 reduction target by adopting a mid-term target of 25 percent below 2005 emissions by 2030. However, the CAP has not yet gone through CEQA review and is therefore not considered a qualified GHG reduction plan per State *CEQA Guidelines* Section 15183.5.

CITY OF WATSONVILLE MUNICIPAL CODE

The City's Municipal Code includes the following regulations designed to reduce GHG emissions from future development:

- California Green Building Standards Code (Section 8-15.01)
- Model Water Efficient Landscape Ordinance (Section 6-3.801)
- Mandatory Organic Waste Disposal Reduction (Chapter 10)

SANTA CRUZ COUNTY CODE

The County Code includes the following regulations designed to reduce GHG emissions from future development:

- California Green Building Standards Code (Section 12.10.250)
- Water Efficient Landscaping Ordinance (Chapter 13.13)
- Required Diversion of Covered Materials (Article VII)

Significance Thresholds

According to *CEQA Guidelines* Section 15183.5, project analysis can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Best Practices in Implementing Climate Action Plans*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2018). To date, the County of Santa Cruz, the City of Watsonville, and MBARD have not adopted a qualified CAP to address significance.

In the absence of a qualified CAP or any adopted numeric threshold, the significance of the project's GHG emissions is evaluated consistent with *CEQA Guidelines* Section 15064.4(b) by considering whether the project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Neither has the MBARD, the California Office of Planning and Research, CARB, the California Air Pollution Control Officers Association (CAPCOA), or any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project.

The most directly applicable adopted regulatory plans to reduce GHG emissions are the 2017 Scoping Plan, the 2045 MTP/SCS, and the County's Climate Action Strategy. GHG emissions from the construction and operation of the project are provided for informational purposes following the 2017 Scoping Plan GHG emission per capita targets. The 2017 Scoping Plan establishes a statewide goal of 6.0 MT of CO₂e per capita by 2030.

Methodology

GHG emissions from project construction and operation were estimated using CalEEMod, Version 2020.4.0. The model calculates emissions of the following GHGs: CO₂, N₂O, and CH₄, reported as CO₂e. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices A, D, and E (CAPCOA 2017). CalEEMod output files for the project are included in Appendix B to this report.

Impacts Assessment

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

As mentioned above in *Significance Thresholds*, neither the County of Santa Cruz nor MBARD have adopted a CEQA-compliant GHG reduction plan. Therefore, the regional GHG reduction policies and regulations most applicable to the project are those found in CARB's 2017 Scoping Plan, AMBAG's 2045 MTP/SCS, and the County's General Plan.

GHG Emissions

Construction and operation of the project would generate GHG emissions. This analysis considers the combined impact of GHG emissions from both construction and operation. Calculations of CO₂, CH₄, and N₂O emissions are provided for informational purposes to identify the magnitude of project's emissions.

As discussed in the 2017 Scoping Plan goals, local jurisdictions may demonstrate consistency with Scoping Plan goals (i.e., SB 32's emission reduction target) by establishing communitywide emissions targets tied to the statewide per capita goals of 6.0 MT of CO₂e per capita by 2030. Based on AMBAG Regional Growth Forecasts, the City of Watsonville is anticipated to have a population of approximately 54,270 residents and 29,156 jobs in 2030 (AMBAG 2022). As shown in Table 12, the communitywide emissions target of 6.0 MT of CO₂e may be equated to approximately 4.0 MT of CO₂e per service population (SP) in 2030.

Table 12 GHG Performance Threshold Determination

Metric	Quantity
Service Population Calculation	
2030 Population	54,270 persons
2030 Employment	29,156 jobs
2030 Service Population	83,426 SP
2030 Communitywide Target Derivation	
Per Capita Target	6.0 MT of CO ₂ e per capita ¹
Mass Emissions Target ²	1,704,876 MT of CO ₂ e
Service Population Target ³	4.0 MT of CO ₂ e per SP

MT of CO₂e = metric tons of carbon dioxide equivalent; SP = service population

¹ Source: CARB 2017

² 6.0 MT of CO₂e per capita * 54,270 persons = 325,620 MT of CO₂e

³ 325,620 MT of CO₂e / 83,426 SP = 4.0 MT of CO₂e per SP

Source: AMBAG 2022

Project construction would generate temporary short-term GHG emissions through travel to and from the worksite and from the operation of construction equipment such as graders, backhoes, and generators. Excavation, grading, and trenching typically generate the most emissions due to the use of grading equipment and soil hauling. Construction of the project would generate approximately 1,400 MT CO₂e over the entire construction period. As there is no applicable construction GHG threshold, this calculation is included for informational purposes. As construction emissions occur for a limited period of a project’s lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. As shown in Table 13, the proposed project’s amortized construction-related emissions would be 47 MT CO₂e.

Operation of the proposed project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. Table 13 combines the estimated construction and operational GHG emissions associated with development of the project. As shown therein, the project would generate approximately 3,556 MT of CO₂e per year during operation. Total emissions (amortized construction emissions plus annual operation emissions) would be 3.9 MT of CO₂e per year per SP (conservatively rounded up to the nearest tenth). These emissions would not exceed the 4.0 MT of CO₂e per year per service person goal developed to demonstrate consistency with the 2017 Scoping Plan. Therefore, the project would be consistent with the statewide GHG reduction targets. Impacts would be less than significant.

Table 13 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO₂e per year)
Construction	
Annual ¹	350
Number of years	4
Construction Total	1,400
Amortized over 30 years	47
Operational	
Area	3
Energy	724
Mobile	2,286
Solid Waste	499
Water	44
Operational Total	3,556
Total Emissions	3,603
Service Population (Residents)	941
Emissions per Service Person²	3.9
Threshold	4.0
Threshold Exceeded?	No

MT = metric tons; CO₂e = carbon dioxide equivalents

¹ Construction emissions assume 25 percent of buildout occurring in the first year of construction (2023) and a total construction duration of four years. This represents a conservative approach because emission factors are lower in future years. Additional methodology can be found in Appendix B.

² Emissions per SP rounded up to the nearest tenth.

Notes: Emissions modeling was completed using CalEEMod. See Appendix B for modeling results.

2017 Scoping Plan

The 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan’s goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills. The project would be required by the Santa Cruz County Code to divert covered materials from construction and demolition waste. The project would also be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, equal to the expected electricity usage, in accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards. The project would meet the requirements of the 2022 California Energy Code. The project would be consistent with the 2017 Scoping Plan’s goal of increasing renewable energy in the state, and energy efficiency efforts to reduce GHG emissions to meet the State’s climate goals. Therefore, the project would be consistent with the 2017 Scoping Plan.

AMBAG 2045 MTP/SCS

AMBAG adopted an updated MTP/SCS, *Moving Forward Monterey Bay 2045*, in June 2022. The 2045 MTP/SCS is reflective of legislation SB 375 described in *Regulatory Setting* above, to focus land use development around high-quality transit corridors as a means to reduce passenger vehicle GHG emissions. Table 14 below describes the project’s consistency with the MTP/SCS three central goals applicable to the project.

Table 14 Project Consistency with the AMBAG 2045 MTP/SCS

Policy	Consistency
<p>Access and Mobility. Provide convenient, accessible, and reliable travel options while maximizing productivity for all people and goods in the region</p>	<p>Consistent. The project would facilitate development of interior roadways and sidewalks to provide vehicle, bicycle, and pedestrian access between the site and downtown Watsonville area. The project would be served by an existing Santa Cruz METRO bus stop and bike lanes on Freedom Boulevard. Therefore, development facilitated by the project would have accessible and reliable travel options to help reduce reliance on solo vehicle trips.</p>
<p>Environment. Promote environmental sustainability and protect the natural environment.</p>	<p>Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards. Development facilitated by the project would include solar-ready or PV systems would be installed on at least the residential building or buildings envisioned in the proposed Master Plan. As described in other sections of this IS-MND, impacts on environmental resources would be less than significant, with or without implementation of mitigation measures.</p>
<p>Land Use & Housing. Investment in safe bicycle and pedestrian routes that improve connectivity and access to common destinations, such as connections between residential areas and schools, employment centers, neighborhood shopping, and transit stops and stations, supporting efforts throughout the region to improve connectivity and realize public health benefits from these investments.</p>	<p>Consistent. The project would facilitate the development of one or more updated County health services buildings and one or more residential buildings. The project would be served by existing bike lanes on Freedom Boulevard and an existing Santa Cruz METRO bus stop on Freedom Boulevard.</p>
<p>Source: AMBAG 2022</p>	

County of Santa Cruz General Plan

As noted above in *Regulatory Setting*, the County of Santa Cruz General Plan contains polices related to reducing GHG emissions. Table 15 indicates the project’s consistency with San Cruz County General Plan elements, goals and policies pertaining GHGs.

Table 15 Project Consistency with the County General Plan

Policy	Consistency
<p>Policy 5.17.1. Promote alternative energy sources. Promote the use of energy sources which are renewable, recyclable, and less environmentally degrading than non-renewable fossil fuels.</p>	<p>Consistent. The project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards. The project would be required to be solar-ready or include the installation of photovoltaic systems on all low-rise residential buildings, equal to the expected electricity usage, in accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards.</p>
<p>Policy 5.18.1. New development. Ensure new development projects are consistent at a minimum with the Monterey Bay Unified Air Pollution Control District [now MBARD] Air Quality Management Plan and review such projects for potential impact on air quality.</p>	<p>Consistent. As discussed in Section 3, <i>Air Quality</i>, the project would not cause the area to exceed the regional growth forecasts and would not conflict with the implementation of the AQMP.</p>

Policy	Consistency
<p>Policy 5.18.2. Non-Attainment pollutants. Prohibit any net increase in emissions of non-attainment pollutants or their precursors from new or modified stationary sources which emit 25 tons per year or more of such pollutants.</p>	<p>Consistent. As discussed in Section 3, <i>Air Quality</i>, the project would not result in the emission of 25 tons per year or more of PM₁₀, VOC, NO_x, CO, or SO_x.</p>
<p>Policy 5.18.7. Alternatives to the automobile. Emphasize transit, bicycles and pedestrian modes of transportation rather than automobiles.</p>	<p>Consistent. Development facilitated by the project would be served by existing bike lanes and an existing Santa Cruz METRO transit stop on Freedom Boulevard, which would help reduce reliance on vehicle trips.</p>
<p>Policy 3.1.1. Land use patterns (jobs/housing balance). Encourage concentrated commercial centers, mixed residential and commercial uses, and overall land use patterns which reduce urban sprawl and encourage the reduction of vehicle miles traveled per person.</p>	<p>Consistent. The project would facilitate development of residential and County health services uses within an already developed site in Watsonville, thereby avoiding urban sprawl. Development facilitated by the project would be served by existing bike lanes and an existing Santa Cruz METRO transit stop on Freedom Boulevard, which would help reduce vehicle miles traveled per person.</p>

In summary, the consistency analysis provided above demonstrates that the project would comply with or exceed the plans, policies, regulations and GHG reduction actions/strategies outlined in AMBAG’s 2045 MTP/SCS, the 2017 Scoping Plan, and the County’s General Plan. Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the project’s incremental contribution of GHG emissions. Therefore, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located in 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The project site is developed and in an urban area and is not known to contain or be contaminated with hazardous materials or hazardous waste. The determination that the site is not known to contain hazardous materials or hazardous contamination is based on a review of federal and state records and databases. Specifically, the project site was queried on June 24, 2022, in the following record sets and databases compiled pursuant to Government Code Section 65962.5:

- Department of Toxic Substances Control (DTSC) Online Cortese List of Hazardous Waste and Substances Sites (DTSC 2022)
- California State Water Resources Control Board (SWRCB) GeoTracker (SWRCB 2022)
- Geologic Energy Management Division (CalGEM) Well Finder online Map Viewer (CalGEM 2022)
- US Department of Transportation (USDOT) National Pipeline Mapping System (NPMS) online Public Map Viewer (USDOT 2022)

A search of the above listed government databases and environmental records compiled pursuant to Government Code Section 65962.5 did not reveal known records or cases of hazardous materials sites or contamination on or adjacent to the project site. The search of the SWRCB GeoTracker database showed that there are three leaking underground storage tank sites within 1,000 feet of the project site; however, these sites are listed as “completed – case closed,” meaning the sites have been remediated to the satisfaction of the SWRCB.

The closest airport to the project site is the Watsonville Municipal Airport, located approximately 1.2 miles northwest of the project site. While the project site is not within the airport’s land use plan, the northeastern corner of the site is within the airport’s outermost noise contour. Areas within this contour would experience a maximum Community Noise Equivalent Level (CNEL) of 55 decibels (dBA). According to the Watsonville Municipal Airport Master Plan, the project site is not within an area subject to Federal Aviation Regulations Part 77 surfaces, which pertains to building height limitations (City of Watsonville 2003).

Regulatory Setting

Federal

THE FEDERAL TOXIC SUBSTANCES CONTROL ACT AND THE RESOURCE CONSERVATION RECOVERY ACT

The Federal Toxic Substances Control Act and the Resource Conservation Recovery Act (RCRA) were administered by the U.S. EPA in 1976 to streamline regulations pertaining to the generation, transportation, treatment, storage, and disposal of hazardous waste.

THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) provides a Federal “Superfund” to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the EPA was given power to seek out those parties responsible for release and assure their cooperation in the cleanup. The Superfund Amendments and Reauthorization Act of 1986 reauthorized CERCLA to continue cleanup activities around the country.

HAZARDOUS MATERIALS TRANSPORTATION ACT

Under the Hazardous Materials Transportation Act the transportation of hazardous materials is regulated by the Secretary of the Department of Transportation (DOT). In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act to clarify the maze of conflicting state, local, and federal regulations. Like the Hazardous Materials Transportation Act, the Hazardous Materials Transportation Uniform Safety Act requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property.

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials.

State

THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL

The Department of Toxic Substances Control (DTSC) is a department operating under the EPA that is responsible for regulating hazardous waste in California. Management and staff of the DTSC protect Californians and their environment from exposure to hazardous wastes by enforcing hazardous waste laws and regulations. The department takes enforcement action against violators; oversees cleanup of hazardous wastes on contaminated properties; makes decisions on permit applications from companies that want to store, treat, or dispose of hazardous waste; and protects consumers against toxic ingredients in everyday products.

REGIONAL WATER QUALITY CONTROL BOARD

The Central Coast RWQCB oversees cases involving groundwater contamination within the Bay Area from Spills, Leaks, Incidents and Clean-up cases while the County of Santa Cruz's Department of Environmental Health would oversee most leaking underground storage tank cases. In the incidence of a spill at a project site, the applicant would notify the County of Sant Cruz and a lead regulator (County, RWQCB or DTSC) would be determined.

GOVERNMENT CODE §65962.5 (CORTESE LIST)

Section 65962.5 of the Government Code requires the California Environmental Protection Agency (CalEPA) to develop and annually update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by DTSC and SWRCB.

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The County of Santa Cruz adopted the General Plan and Local Coastal Program in 1994. The 1994 General Plan and Local Coastal Program includes the Chapter 6, Public Safety, which provides the

following objectives and policies pertaining to hazards and hazardous materials applicable to the proposed project:⁷

Objective 6.6 Hazardous and Toxic Materials. To eliminate, to the greatest degree possible, the use of hazardous and toxic materials, and where it is not feasible completely to eliminate the use of such materials, then to minimize the reduction in the use of such materials, so as to ensure that such materials will not contaminate any portion of the County's environment, including the land, water, and air resources of the County.

Policy 6.6.1 Hazardous Materials Ordinance. Maintain the County's Hazardous Materials ordinance, placing on users of hazardous and toxic materials the obligation to eliminate or minimize the use of such materials wherever possible, and in all cases to minimize the release, emission, or discharge of hazardous materials to the environment, and properly to handle all hazardous materials and to disclose their whereabouts. Further, maintain the County's ordinance relating to ozone-depleting compounds. Ensure that any amendment of existing ordinance provisions is based on a finding that the amendments will provide protection to the environment and the community against toxic hazards that is equal to or stronger than the existing provisions.

Policy 6.6.3 Maintenance of Standards for Use and Control. Ensure that Santa Cruz County maintains standards for the use and control of hazardous materials which are at least equal in their protection for the environment and the community to measures imposed by other local governments within Santa Cruz County, and in adjoining counties.

SANTA CRUZ COUNTY CODE

The Santa Cruz County Code contains several chapters that address hazards and hazardous materials, including Chapter 7.22, Medical Waste, and Chapter 7.100, Hazardous Materials-Hazardous Waste-Underground Storage Tanks. Chapter 7.22 addresses the California Medical Waste Management Act and establishes the County Environmental Health Division as the enforcement agency for the act. Chapter 7.22 requires that medical waste generators obtain and maintain a permit from the County. Chapter 7.100 addresses general provisions, permits, hazardous materials management plans, use, handling and storage responsibilities, unauthorized releases, and administration and enforcement.

SANTA CRUZ COUNTY EMERGENCY OPERATIONS PLAN

An Emergency Operations Plan (EOP) is required for each local government in California. The guidelines for the plan come from the Federal Emergency Management Agency (FEMA) and are modified by the State Office of Emergency Services for California needs and issues. The purpose of the plan is to provide a legal framework for the management of emergencies and guidance for the conduct of business in the Emergency Operations Center. The EOP provides guidance for County response to extraordinary emergency situations associated with natural disasters, technological incidents, and other scenarios (County of Santa Cruz 2019).

COUNTY OF SANTA CRUZ LOCAL HAZARD MITIGATION PLAN 2021-2026

The County of Santa Cruz Local Hazard Mitigation Plan identifies potential hazards in the County, including hazards such as earthquakes, floods, drought, coastal erosion, and climate change.

⁷ Recent amendments to the General Plan currently under consideration by the California Coastal Commission renumbered this objective and these policies 6.9, 6.9.1, and 6.9.3 respectively.

purpose of hazard mitigation is to implement and sustain actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Mitigation actions include both short-term and long-term activities that reduce the impacts of hazards, reduce exposure to hazards, or reduce effects of hazards through various means, including preparedness, response, and recovery measures. Effective mitigation actions also reduce the adverse impacts and cost of future disasters (County of Santa Cruz 2021).

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville General Plan outlines goals and policies to guide planning and development practices within the City. The General Plan outlines the City's goals, policies, and implementation measures as they pertain to environmental hazards and considerations. Those included (below) are applicable to the project (City of Watsonville 1994).

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.

Measure 12.A.5: Risk reduction. The City shall identify, avoid, and/or minimize natural and human-caused hazards in the development of property and regulation of land use.

Policy 12.E: Hazardous materials control. The City shall strictly enforce ordinances and regulations for the use, storage, transport, and disposal of hazardous materials.

Measure 12.E.5: Collection and disposal. The City shall follow state and federal regulations to ensure that hazardous wastes are collected and disposed of in a manner that prevents contamination to air, soil, or water. Special effort shall be made to develop a Hazardous Waste Disposal Program for low-level users (i.e., households, small businesses).

Measure 12.F.7: Emergency access. On dead end streets longer than allowed by the city development standards, secondary emergency access shall be required for use by emergency vehicles or approved built-in fire protection provided

Measure 12.F.8: Fire flow. New development shall be conditioned to provide adequate water for fire suppression in accordance with city standards for minimum volume and duration of flow.

Measure 12.F.9: Open area. Property owners shall be responsible for maintaining vacant sites free of trash, weeds, or other fire safety hazards.

Measure 12.F.10: Building safety. Property owners shall be responsible for maintaining their structures at a reasonable degree of fire and life safety as identified by the uniform fire, building, mechanical, electrical and other such adopted codes and city ordinances.

Impacts Assessment

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. *Would the project 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?*

Construction

Project construction would include the temporary transport, storage, use, or disposal of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials must be transported under U.S. DOT regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. DTSC does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Compliance with existing regulations would reduce the risk of potential release of hazardous materials from spills and transport during construction.

Since the proposed project would disturb more than one acre of land, the applicant would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ) to comply with Clean Water Act National Pollutant Discharge Elimination System (NPDES) requirements. Compliance with these requirements would include preparation of a Storm Water Pollution Prevention Plan (SWPPP), which would specify BMPs for rapid containment and cleanup of accidental hazardous materials spills or leaks, such as minor spills when refueling equipment on-site. Compliance with NPDES requirements and applicable hazardous materials regulations would ensure that construction impacts are less than significant.

Operation

The County health services building(s) may involve the use, storage, transport, and disposal of potentially hazardous medical materials and wastes. These materials would be handled, stored, transported, and stored in accordance with applicable federal and State laws and regulations, including but not limited to those described above under *Construction*, and in accordance with materials' manufacturer specifications. Residential buildings typically do not use or store large quantities of hazardous materials other than those typically used for household cleaning, maintenance, and landscaping. For example, households may contain one or several gallons of paint for touching up interior architectural features, such as baseboards along walls. Therefore, project operation would not involve the routine use, storage, transportation, or disposal of substantial quantities of hazardous materials and would not result in the release of such materials into the environment. Impacts from project operation would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

H.A. Hyde Elementary School is approximately 0.2 mile west of the project site. However, as described under *Operation* above, project operation would not involve the use or storage of hazardous materials other than minor household chemicals in household quantities or medical supplies. Though potentially hazardous materials such as fuels, lubricants, solvents, and oils could be used during project construction, the transport, use and storage of hazardous materials would be conducted in accordance with applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the CCR, Title 22. Likewise, disposal of medical waste would comply with applicable laws. Additionally, the project site is currently used for health services, and the generation of medical waste is an existing condition on-site. Compliance with applicable laws and regulations would ensure that impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

As described in the *Existing Setting* above, a review of regulatory agency databases revealed that the project site is not listed as a hazardous waste and substances site and is not within 1,000 feet of such a site. There are no active cleanup sites within 1,000 feet of the project site; three remediated and closed sites containing leaking underground storage tanks are within 1,000 feet of the project site and are inactive (SWRCB 2022). Accordingly, construction and operation of the project would not occur on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create no significant hazard to the public or the environment. The proposed project would have no impact.

NO IMPACT

- 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 or excessive noise for people residing or working in the project area?*

As described in *Existing Setting* above, the Watsonville Municipal Airport is approximately 1.2 miles northwest of the site, and the northeastern corner of the site is within the airport's 55 dBA CNEL noise contour. The Watsonville Municipal Airport Master Plan and the Watsonville General Plan Public Safety Element determine that office land uses are normally acceptable in areas that experience a maximum CNEL of 70 dBA, and multi-family residential uses are normally acceptable in areas that experience a maximum CNEL of 65 dBA. Because only a portion of the site is within the airport's 55 dBA CNEL noise contour, and both the proposed County health services building(s) and residential building(s) would be compatible with this level of noise, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed residential units would be constructed on property that is not part of an emergency response plan or emergency evacuation plan. It is not anticipated that construction of the proposed project would require lane closures of Freedom Boulevard, Crestview Drive, or Madison Street; however, should a lane closure become necessary, the closure would be intermittent and temporary. Further, a lane or partial road closure would require a road closure plan in accordance with City requirements, which would indicate how traffic would navigate the area while the roadway is closed. The City and City departments, such as Watsonville Fire Department, would be aware of the road closure and have ample arrangements planned in the event of an emergency evacuation or response during project construction because the City must approve closure of City roads. Accordingly, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is in a developed, urbanized area surrounded by residential uses, commercial development, and roadways. There are no adjacent wildlands or densely vegetated areas that would represent a significant fire hazard. Additionally, the project site is not within a High Fire Hazard Severity Zone or Very High Fire Hazard Severity Zone for wildland fires (CAL FIRE 2007). Therefore, the project would not expose people or structures to significant hazards related to wildland fires and there would be no impact.

NO IMPACT

10 Hydrology and Water Quality

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The project site is located within an urbanized area of Watsonville. Watsonville is surrounded by a network of sloughs and marsh habitat that make up the South County Slough System, including the Watsonville Slough, Struve Slough, Gallighan Slough, Hanson Slough, and Harkins Slough. The closest bodies of water to the project site include Watsonville Slough, located approximately 600 feet to the southwest; Corralitos Creek, located approximately 0.4 mile to the northeast; and Struve Slough, located approximately 0.6 mile to the west. There are no waterways present within the project site. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the project site is not located within a flood hazard zone (FEMA 2012). The project site is generally flat with an average elevation of 95 feet above mean sea level.

The project site is underlain by the Pajaro Valley Groundwater Subbasin (subbasin). Groundwater recharges in the subbasin occurs through direct percolation of rainfall and streamflow seepage from the Pajaro River and its tributaries (Pajaro Valley Water Management Agency 2014). Public and private development in the City of Watsonville relies on the subbasin for nearly all its water supply, and water use within the City accounts for about 14 percent of the total annual pumping from the subbasin. The City also intermittently draws water from surface water sources (City of Watsonville 2020). The project site is within the water service area of Watsonville Municipal Utility (WMU). WMU's service area includes the City of Watsonville and unincorporated areas of Santa Cruz County to the north, including the communities of Freedom and Corralitos. There are approximately 65,200 customers served in this area. WMU operates 14 groundwater wells, eight reservoirs and water storage facilities, nine booster stations, over 190 miles of pipeline, and the Corralitos Filter Plant (City of Watsonville 2020).

Stormwater is removed from the site primarily by percolation into the ground and by overland flow into the City's existing stormwater management system within Freedom Boulevard, Crestview Drive, and Madison Street.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. Seiches are the oscillation of large bodies of standing water, such as lakes, that can occur in response to ground shaking. In addition, mudflows are large, rapid masses of mud formed by loose earth and water, primarily affecting hillsides and slopes of unconsolidated material. The nearest body of water capable of a substantial tsunami is the Pacific Ocean, located approximately five miles west of the site. Further, the nearest body of water capable of a substantial seiche is Harkins Slough, located approximately 2.3 miles west of the site.

Regulatory Setting

Federal

CLEAN WATER ACT

The EPA implements pollution control programs through the Clean Water Act (CWA). The CWA was officially recognized by congress in 1972 and made it unlawful to discharge a pollutant or pollutants from a point source into navigable waters (see 33 CFR Part 329), unless a permit was obtained. EPA's NPDES permit program controls discharges with the main goal of restoring and maintaining the chemical, physical, and biological integrity of the Nation's waters.

State

STATE WATER RESOURCES CONTROL BOARD CONSTRUCTION GENERAL PERMIT

Any construction or demolition activity that results in land disturbance equal to or greater than one acre must comply with the Construction General Permit (CGP), administered by SWRCB. The CGP requires the installation and maintenance of BMPs to protect water quality until the site is stabilized.

SUSTAINABLE GROUNDWATER MANAGEMENT ACT

The Sustainable Groundwater Management Act (SGMA) of 2014 is intended to provide for sustainable management of groundwater basins and to locally manage groundwater basins while minimizing state intervention to only when necessary. The SGMA requires the creation of Groundwater Sustainability Agencies (GSAs) to implement the SGMA and to prepare groundwater sustainability plans. The Pajaro Valley Water Management Agency (PVWMA) is the GSA for the Pajaro Valley Groundwater Subbasin. PVWMA prepared its Basin Management Plan as an alternative to a groundwater sustainability plan in 2016, which was approved by the Department of Water Resources in 2019. PVWMA established the following goals for the Basin Management Plan (PVWMA 2014):

- Help achieve the PVMWA charter objective
- Provide an update of previous planning efforts
- Define the appropriate course of action toward optimizing the use of available supplies and solving seawater intrusion and overdraft problems
- Accomplish these tasks through a community-based process that is inclusive and adaptive

Water resource management activities carried out under this act in the public interest shall recognize the following objectives:

- Local groundwater resources should be managed toward the avoidance and eventual prevention of conditions of long-term overdraft, land subsidence, and water quality degradation.
- Local economies should be built and sustained on reliable, long-term supplies and not long-term overdraft as a source of water supply.
- Water management programs should include reasonable measures to prevent further increases in the amount of long-term overdraft and to accomplish continuing reduction in long-term overdraft, realizing that an immediate reduction in long-term overdraft may cause severe economic loss and hardship.
- Conservation and economically efficient management of water resources are necessary to meet the needs of agriculture, industry, and urban communities. Economic efficiency requires that water users pay their full proportionate share of the costs of developing and delivering water. Property taxes shall not be used for payment of these costs. Agricultural uses shall have priority over other uses under this act within the constraints of state law.
- Water conservation programs appropriately include the ability of a water management agency to recognize existing beneficial uses, and to acquire, buy, and transfer water and water rights in the furtherance of its purposes.
- The purpose of this agency is to efficiently and economically manage existing and supplemental water supplies in order to prevent further increase in, and to accomplish

continuing reduction of, long-term overdraft and to provide and insure sufficient water supplies for present and anticipated needs within the boundaries of the agency.

- It is anticipated that long-term overdraft problems may not be solved unless supplemental water supplies are provided. The water management agency should, in an efficient and economically feasible manner, utilize supplemental water and available underground storage and should manage the groundwater supplies to meet the future needs of the basin.

Local and Regional

WATER QUALITY CONTROL PLAN FOR THE CENTRAL COAST BASIN

The Water Quality Control Plan for the Central Coast Basin (Basin Plan) is the Central Coast Regional Water Quality Control Board (RWQCB) master water quality control planning document (Central Coast RWQCB 2019). The Basin Plan designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. Chapter 2 of the Basin Plan identifies a range of beneficial uses for waters of the State, such as agricultural uses, uses for wildlife habitat, groundwater recharge, municipal water supply, and recreation, as examples. Chapter 3 of the Basin Plan identifies the water quality objectives for waters of the State, such as bacterial objectives, water-color objectives, dissolved oxygen objectives, pH, water temperature objectives, and salinity. The Basin Plan also includes programs of implementation to achieve water quality objectives. The Basin Plan has been adopted and approved by the State Water Resources Control Board, U.S. EPA, and the Office of Administrative Law.

CITY OF WATSONVILLE GENERAL PLAN

The City of Watsonville General Plan Environmental Resource Management Element and the Public Facilities and Services Element contain goals, policies, and implementation measures pertaining to water quality and management. The following goals, policies, and measures are applicable to the project (City of Watsonville 1994):

Environmental Resource Management Element

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.

Measure 9.D.2: Erosion control. The City shall continue to enforce regulations over grading activities and other land use practices that expose bare soil and accelerate soil erosion and sedimentation.

Public Facilities and Services Element

Goal 11.3: Water supply. Construct and maintain a water system and institute water management policy that will provide a sufficient quantity of appropriate-quality water to meet the needs of the existing and planned community.

Measure 11.C.5: Site improvements. New projects within the urbanized area shall be required to complete on-site water connection improvements consistent with water quality standards of the Water Department.

Measure 11.D.2: New water demand mitigation. New demand for water shall be mitigated to the greatest extent possible. The City shall continue its present policy of demand reduction

requirements for the new development and payment of groundwater impact fees for residential construction. The policies shall be extended to other types of development on an equitable basis.

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Conservation and Open Space Element of the County of Santa Cruz General Plan (revised 2018) provides the following objectives and policies applicable to the proposed project and pertaining to hydrology and water quality.

Objective 5.4 Monterey Bay and Coastal Water Quality. To improve the water quality of Monterey Bay and other Santa Cruz County coastal waters by supporting and/or requiring the best management practices for the control and treatment of urban run-off and wastewater discharges in order to maintain local, state and national water quality standards, protect County residents from health hazards of water pollution, protect the County's sensitive marine habitats and prevent the degradation of the scenic character of the region.

Policy 5.4.1 Protecting the Monterey Bay National Marine Sanctuary from Adverse Impacts.

Prohibit activities which could adversely impact sensitive habitats of the Monterey Bay National Marine Sanctuary, including the discharge of wastes and hazardous materials. The main sources of concern are wastewater discharge, urban runoff, toxic agricultural drainage water, including that originating outside of Santa Cruz County, and the accidental release of oil or other hazardous material from coastal tanker traffic.

Policy 5.4.3 Wastewater Discharges into Coastal Waters. Require a review of any new and/or increased wastewater discharge into the Monterey Bay or other coastal waters to address the potential marine water quality impacts and determine necessary mitigations.

Policy 5.4.14 Water Pollution from Urban Runoff. Review proposed development projects for their potential to contribute to water pollution via increased storm water runoff. Utilize erosion control measures, on-site detention and other appropriate storm water best management practices to reduce pollution from urban runoff.

Objective 5.5a Watershed Protection (Local Coastal Program). To protect and manage the watersheds of existing and future surface water supplies to preserve the quality and quantity of water produced and stored in these areas to meet the needs of County residents, local industry, agriculture, and the natural environment.

Policy 5.5.9 Development Activities Within Water Supply and Least Disturbed Watersheds.

Require all grading, building, and timber harvesting in Water Supply and Least Disturbed Watersheds to meet strict standards for erosion control and protection of water quality as outlined in the Erosion Hazard and Drainage Facilities sections of this Plan and as identified in the San Lorenzo River Watershed Management Plan.

Policy 5.5.12 Drainage Design in Water Supply Watersheds. Require retention of stormwater runoff from impervious surfaces for all new development in Water Supply Watersheds through on-site percolation methods where feasible, so that runoff will not exceed pre-development runoff levels. Utilize on-site detention methods where percolation methods are not feasible. Either system should conform to the minimum design storm as determined by the County Design Criteria.

Objective 5.7 Maintaining Surface Water Quality. To protect and enhance surface water quality in the County's streams, coastal lagoons and marshes by establishing best management practices on adjacent land uses.

Policy 5.7.3 Erosion Control for Stream and Lagoon Protection. For all new and existing development and land disturbances, require the installation and maintenance of sediment basins, and/or other strict erosion control measures, as needed to prevent siltation of streams and coastal lagoons.

Policy 5.7.4 Control Surface Runoff. New development shall minimize the discharge of pollutants into surface water drainage by providing the following improvements or similar methods which provide equal or greater runoff control:

- (a) include curbs and gutters on arterials, collectors and locals consistent with adopted urban street designs; and
- (b) oil, grease and silt traps for parking lots, land divisions or commercial and industrial development.

Objective 5.8a Groundwater Protection. To protect the quantity and quality of the County's groundwater resources through an integrated program of land use regulation and runoff management in groundwater recharge areas, careful water quality monitoring and management of extractions consistent with long-term sustainable water supply yields.

Objective 5.8b Overdrafted Groundwater Basins. To act directly and coordinate and work with relevant water purveyors and agencies to eliminate long-term groundwater overdraft in all water basins where overdraft has been documented.

Policy 5.8.3 Uses in Primary Groundwater Recharge Areas. Prohibit any land use in a Primary Groundwater Recharge Area which would allow the percolation of pollutants into the groundwater system.

Policy 5.8.4 Drainage Design in Primary Groundwater Recharge Areas. Require retention of stormwater runoff from impervious surfaces for all new development in Primary Groundwater Recharge Areas through on-site percolation methods so as not to exceed predevelopment runoff levels. Utilize on-site detention methods where percolation methods are not feasible; either system should be designed for a minimum design storm as determined by the County Design Criteria.

SANTA CRUZ COUNTY CODE

Chapter 7.69 – Water Conservation

Section 7.69.030, Prohibited Water Uses, of the Santa Cruz County Code prohibits various wasteful uses of water in the County including the watering of grass, lawn, groundcover, shrubbery, open ground, crops, and trees, including agricultural irrigation, in a manner or to an extent which allows water to run off from the area being watered.

Chapter 7.79 – Runoff and Pollution Control

Section 7.79.040, Prohibited Discharges, Exemptions and Limitations, of the Santa Cruz County Code prohibits any non-storm water discharge to leave private property, enter the storm drain system, enter receiving waters of the County, or percolate into groundwater. Irrigation water contained on private property is exempt from the prohibition of discharge if it does not result in contamination or

pollution; however, section 7.69.030 disallows excess runoff from the area being watered. Section 7.79.070, Storm Drain System and Channel Modification Prohibited, prohibits the unpermitted alteration to drainage patterns or modifications to the storm drain system or any channel that is part of a receiving water of the County. This section also prohibits the deposit of fill, debris, or other material in the storm drain system, a drainage channel, or on the banks of a drainage channel where it might enter the storm drain system or receiving waters and divert or impede flow. The County is granted the authority under this chapter to inspect a property with permission from the owner whenever it has probable cause to believe that there exists, or potentially exists, any condition which constitutes a violation of the chapter.

County of Santa Cruz Grading Ordinance

Chapter 16.20 of the Santa Cruz County Code is the Santa Cruz County Grading Ordinance. The purpose of this chapter is to safeguard health, safety, and the public welfare; to minimize erosion and the extent of grading; to protect the watersheds; to ensure the natural appearance of grading projects; and to otherwise protect the natural environment of Santa Cruz County. This chapter sets forth rules and regulations to control all grading, including excavations, earthwork, road construction, dredging, diking, fills and embankments. It also establishes the administrative procedure for issuance of permits and provides for approval of grading plans and inspections. A proposed grading plan must be accompanied by an erosion control plan and erosion preventative measures, in accordance with the requirements of the County Erosion Control Ordinance.

County of Santa Cruz Erosion Control Ordinance

Chapter 16.22 of the Santa Cruz County Code is the Santa Cruz County Erosion Control Ordinance. The purpose of this chapter is to eliminate and prevent conditions of accelerated erosion that have led to, or could lead to, degradation of water quality, damage to property, loss of topsoil and vegetation cover, disruption of water supply, and increased danger from flooding. This chapter requires control of all existing and potential conditions of accelerated erosion and sets forth required provisions for preparation of erosion control plans, runoff control, and land clearing approval. An erosion control plan indicating proposed methods for the control of runoff, erosion, and sediment movement must be submitted and approved with a grading plan prior to issuance of a building permit or development permit. Erosion control plans are designed to minimize erosion during construction and throughout the life of the project.

Impacts Assessment

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Project construction would result in short-term soil disturbance that could lead to increased erosion and sedimentation, which would decrease water quality and be a potential violation of water quality standards. However, the project would disturb more than one acre of land and therefore would have to comply with the NPDES Construction General Permit. A SWPPP would be required to be prepared and implemented under these requirements, which includes appropriate erosion-control and water-quality-control measures. Implementation of the SWPPP would prevent erosion and sedimentation during construction. The SWPPP must also contain cleanup actions or measures in the event of fluid spills or leaks, such as diesel fuel, during construction.

During project operation, the potential for on-site erosion would be negligible because the project site would be developed with impervious surfaces such as residential or County health services buildings, sidewalks and parking areas, or landscaped areas. Impervious surface and landscaping would cover soils and prevent erosion. Impervious surfaces prevent the infiltration of water and other fluids, such as motor oil that may collect on parking surface over time. During project operation, on-site vehicles would be stored or parked in paved parking areas, which would result in low potential for small amounts of vehicle fluids, such as minor oil leaks, to infiltrate and impact groundwater quality, or to flow overland into surface water or storm drains. Additionally, vehicles associated with operation of County Health Services currently park on the project site.

The residential uses on-site during operation would not involve activities with potential for substantial impacts to water quality. The County health services building(s) could store chemicals and potentially hazardous materials; however, the use, transport, storage, and disposal of these materials would be governed by existing federal, state, and local regulations, as discussed in Section 9, *Hazards and Hazardous Materials*. Additionally, this would be similar to existing conditions because the County currently operates health services on the project site. Small quantities of household chemicals, such as cleaners or paint, could be stored within the residential component on-site, but would be stored within the interior of the dwelling units. Existing law prohibits improper use and disposal of these substances, such as by pouring down sink drains or onto lawn areas. Therefore, there would be no potential for these substances to be discharged to groundwater or surface water.

Maintenance of on-site landscaping would involve the use of lawnmowers, leaf blowers, and other similar equipment power by small engines, consistent with maintenance of existing landscaping on the site. Governor Newsom signed Assembly Bill 1346 into law in October 2021, phasing out the sale of gasoline-powered small off-road engines, such as those found in lawnmowers and leaf blowers. However, because the project would be operational before these engines are likely to be fully phased out, lawn maintenance could involve bringing gasoline to the project site. The quantity of gasoline would be minor, typically on the order of several gallons given the limited fuel capacity of lawn equipment. Additionally, gasoline and fuel must be stored in containers specifically manufactured for that purpose, which reduce the potential for spill if the container is upset. Therefore, maintenance of the landscaping on-site would not have potential for affecting water quality or violating water quality standards. Further, the use of gasoline for landscape maintenance is an existing condition on-site, and the project would be comparable in the amount of landscape requiring maintenance.

In summary, compliance with the Construction General Permit and applicable hazardous materials regulations would minimize water quality impacts during project construction and operation. Therefore, the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The project site is currently occupied by County service buildings and offices, and is partially covered by impervious surfaces. Once project construction is complete, the project site would contain additional impervious surfaces due to expanded County health services building(s) and new

residential building(s). Precipitation falling on the impervious surfaces of the project, such as buildings and parking areas, would be unable to infiltrate the ground surface and instead flow overland. Pursuant to Santa Cruz County Code Section 7.79.110, development facilitated by the project would be required to prevent runoff in excess of predevelopment conditions. This would require stormwater to be captured on-site, such as in bioretention areas, where runoff could infiltrate the ground surface. Further, as described above in *Existing Setting*, groundwater recharge to the Pajaro Valley Groundwater Subbasin occurs through percolation from the Pajaro River; the project site is not adjacent to the Pajaro River and would therefore not substantially interfere with groundwater recharge.

The project site is already served by the WMU water supply system. The expanded health services that would be offered on-site and the residential portion of the project would cause an incremental increase to the project site's existing water demand, which would not result in substantial depletion of the aquifer, as discussed in detail in Section 19, *Utilities and Service Systems*. Therefore, the project's impacts on groundwater supplies and recharge would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) Would the project 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 result in substantial erosion or siltation on- or off-site?*
- c.(ii) Would the project 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

There are no natural drainage features on or near the project site, and the nearest creek or surface water is Corralitos Creek, approximately 0.4 north of the project site. Construction would entail grading, excavation, and other ground-disturbing activities which could temporarily alter surface drainage patterns on-site and increase the potential for erosion and siltation. However, the project would be required to comply with the Construction General Permit and County grading regulations, which would require implementation of BMPs and erosion control measures, thereby reducing the potential for construction activities to result in soil erosion and siltation of waters. During project operation the potential for on-site erosion would be negligible because the project site would be developed with impervious surfaces such as health services and residential buildings, sidewalks and paved parking areas, or landscaped areas. Impervious surface and landscaping would cover soils and prevent soil erosion and siltation of waters.

As described above, the project would be required to comply with NPDES stormwater management requirements and runoff and pollution control requirements established by Santa Cruz County Code Chapter 7.79. Stormwater management features included as a result of these requirements would be required to adequately capture increased stormwater runoff from the project site and prevent flooding. Chapter 7.79 requires post-construction runoff to not exceed pre-construction runoff conditions. Therefore, flooding and siltation impacts resulting from the project's effects on drainage patterns would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(iii) Would the project 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 that would 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?*

The site would contain additional impervious surfaces compared to existing conditions upon project completion. However, because the project site is already developed, the project would not substantially alter existing drainage patterns or contribute runoff water that would exceed the capacity of existing stormwater drainage systems. Further, pursuant to Santa Cruz County Code Section 7.79.110, development facilitated by the project would be required to prevent runoff in excess of predevelopment conditions. The project site is currently used for County health services and would continue to be used for health services after project implementation. Therefore, the health services component of the project would not introduce substantial sources of pollutants to the project site that could be released in stormwater runoff. The residential component could contain minor amounts of household chemicals and substances, such as household paint or cleaning products, that could be pollutants if released into water. However, given that quantities would be minor for household use, and stored inside of residences, there would be negligible risk for release into runoff. For this reason, the project would not create a significant new source of stormwater runoff which would exceed the capacity of existing or planned stormwater drainage system or contribute substantial amounts of polluted runoff. Therefore, the project's impact on stormwater drainage systems would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(iv) Would the project 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 impede or redirect flood flows?*

According to FEMA Flood hazard maps, the project site is not located within a flood hazard zone (FEMA 2012). The nearest flood hazard zone is alongside the Watsonville Slough, approximately 600 feet southwest of the project site. Therefore, no County health service building(s), residential building(s), or other project components would be placed within a 100-year flood hazard area.

The project would increase impervious surface area on the project site compared to existing conditions. However, the project would be required by Santa Cruz County Code Chapter 7.79 to incorporate on-site stormwater management facilities, such as retention areas, where stormwater would collect and be treated before discharge. This treatment process involves infiltration of stormwater through soils, which slows the velocity of the stormwater runoff and releases treated stormwater into the existing storm drain system gradually. Consequently, impacts related to impeding or redirecting flood flows would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

As describe above, Harkins Slough is the nearest body of water capable of a substantial seiche but is approximately 2.3 miles from the project site. The project site is not in the seiche zone of Harkins Slough given the distance between the site and Harkins Slough. Therefore, tsunamis and seiches do not pose hazards due to the inland location of the project site and lack of nearby bodies of standing

water. No steep slopes that would be subject to mudflows are located on or near the project site. Therefore, no impact related to release of pollutants from inundation from tsunamis, seiches or otherwise would occur.

NO IMPACT

- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described above for item (b), the project site is not located in a groundwater recharge area and project water demand would not substantially deplete groundwater supplies such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Furthermore, the project would be required to comply with applicable County ordinances and policies, including implementation of a SWPPP with BMPs, to control erosion and protect water quality. As discussed above for item (a), the project would not violate water quality standards. The project would also not conflict with beneficial uses of water described in the Basin Plan, such as agricultural uses or industrial uses. Therefore, the project would have a less than significant impact related to conflicts with water quality control plans or sustainable groundwater management plans.

LESS THAN SIGNIFICANT IMPACT

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11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

The project site is located at 1430 Freedom Boulevard and consists of Assessor’s Parcel Number 019-017-07. The site is approximately 9.5 acres in size. The project site is designated Public/Quasi-Public under the City of Watsonville’s General Plan and is zoned Public Facilities.

The project site is occupied by six County services buildings, surface parking, and ornamental and ruderal vegetation. Surrounding land uses consist of residential and commercial uses, and other public/quasi-public lands. A cemetery is located immediately northwest of the project site, and a multi-story apartment building abuts the cemetery to the northeast of the site. One- to two-story residences are east of the site across Madison Street, and commercial shopping centers are located across Freedom Boulevard to the west and Crestview Drive to the south. Commercial uses in these shopping centers include restaurants, a grocery store, a furniture store, and a gym.

Regulatory Setting

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The General Plan and Local Coastal Program was adopted by the County Board of Supervisors on May 24, 1994 and certified by the California Coastal Commission on December 15, 1994. It has been amended several times since original adoption. State law provides that a General Plan consists of seven mandatory elements. In certain circumstances, an environmental justice element is also required. The County has addressed state requirements by adopting a General Plan with the following elements: Land Use; Circulation; Housing; Conservation and Open Space; Public Safety; Parks, Recreation, and Public Facilities; Community Design; and Noise. Several of these elements contain goals and policies that intend to reduce environmental impacts of projects carried out in the County.

CITY OF WATSONVILLE GENERAL PLAN

The project site is designated as Public/Quasi-Public in the City of Watsonville General Plan. The General Plan describes general categories of uses allowed in Public/Quasi-Public lands, including government or quasi-public buildings or facilities, public utility facilities, active and passive recreational facilities, schools, and hospitals. Other uses and/or non-profit institutions primarily serving the needs of the general public may also be permitted. The General Plan also states that because of the diversity of uses permitted in the Public/Quasi-Public land use designation, the maximum intensity of development shall be determined based on the appropriateness of the location, accessibility, traffic impacts, existing site conditions, design compatibility with adjacent land uses, natural and built constraints, and community impacts (City of Watsonville 1994).

CITY OF WATSONVILLE MUNICIPAL CODE

The City's Zoning Ordinance (Title 14 of Watsonville Municipal Code) designates the project site as Public Facilities. This zone allows several uses via different use permits. Allowed uses include but are not limited to government offices, clinics and rehabilitation facilities, community centers and related facilities, residential uses, and public or quasi-public facilities. While some residential uses are allowed, affordable housing projects are prohibited in Public Facilities zones.

Impacts Assessment

a. *Would the project physically divide an established community?*

The project site is located within an urbanized area and surrounded by other urban land uses. The project would involve development of the site with one or more County health services buildings, and one or more residential buildings that would accommodate 160 total dwelling units. There are no existing residential uses on the site. The project would also involve demolition of existing buildings on-site. Therefore, the addition of residential buildings would not generate additional barriers to community connectivity compared to existing conditions on the site. The project would not include the construction of barriers such as roadways or other dividing features that would physically divide an established community. Therefore, the proposed project would have no impact.

NO IMPACT

b. *Would the project 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?*

County of Santa Cruz General Plan

The project's consistency with applicable goals and policies of the County's 1994 General Plan adopted for the purpose of avoiding or mitigating an environmental effect is demonstrated below in Table 16.

Table 16 Environmental Goals and Policies of the Santa Cruz County General Plan

Goal/Policy	Project Consistency
Policy 5.1.6. Development Within Sensitive Habitats. Sensitive habitats shall be protected against any significant disruption of habitat values; and any proposed development within	Consistent. As discussed in Section 4, <i>Biological Resources</i> , the project site is developed and is in a developed, urban area. The project site does not contain special-status species, other than the potential for nesting migratory birds. Accordingly, construction of

or adjacent to these areas must maintain or enhance the functional capacity of the habitat. Reduce in scale, redesign, or, if no other alternative exists, deny any project which cannot sufficiently mitigate significant adverse impacts on sensitive habitats unless approval of a project is legally necessary to allow a reasonable use of the land.

Policy 5.2.3. Activities Within Riparian Corridors and Wetlands. Development activities, land alteration and vegetation disturbance within riparian corridors and wetlands and required buffers shall be prohibited unless an exception is granted per the Riparian Corridor and Wetlands Protection ordinance. As a condition of riparian exception, require evidence of approval for development from the US Army Corps of Engineers, California Department of Fish and Game, and other federal or state agencies that may have regulatory authority over activities within riparian corridors and wetlands.

Policy 5.7.1. Impacts from New Development on Water Quality. Prohibit new development adjacent to marshes, streams and bodies of water if such development would cause adverse impacts on water quality which cannot be fully mitigated.

Policy 5.7.3. Erosion Control for Stream and Lagoon Protection. For all new and existing development and land disturbances, require the installation and maintenance of sediment basins, and/or other strict erosion control measures, as needed to prevent siltation of streams and coastal lagoons. (Also see Erosion policies in section 6.3.)

Policy 5.7.4. Control Surface Runoff. New development shall minimize the discharge of pollutants into surface water drainage by providing the following improvements or similar methods which provide equal or greater runoff control:

- include curbs and gutters on arterials, collectors and locals consistent with adopted urban street designs; and
- oil, grease and silt traps for parking lots, land divisions or commercial and industrial development

Policy 5.17.1. Promote Alternative Energy Sources. Promote the use of energy sources which are renewable, recyclable, and less environmentally degrading than non-renewable fossil fuels.

Policy 5.19.2. Site Surveys. Require an archaeological site survey (surface reconnaissance) as part of the environmental

the project would not impact special-status plants or wildlife, save for potential effects on nesting migratory birds. Implementation of Mitigation Measure BIO-1 would ensure that potential impacts to nesting birds would be less than significant. Therefore, the project would not impact or disrupt sensitive habitat.

Consistent. As discussed in Section 4, *Biological Resources*, the project site does not contain wetlands or riparian habitat (USFWS 2020). Therefore, the project would not disturb riparian corridors or wetlands.

Consistent. The project site is not located adjacent to bodies of water and does not contain wetlands or riparian habitat (USFWS 2020). In addition, as described in Section 10, *Hydrology and Water Quality*, the project would not result in adverse impacts to water quality.

Consistent. As described in Section 10, *Hydrology and Water Quality*, the project would be required to comply with NPDES stormwater management requirements and runoff and pollution control requirements established by Santa Cruz County Code Chapter 7.79. An NPDES-compliant SWPPP would be prepared for development facilitated by the project, which would include erosion BMPs and prevention measures. Therefore, the project would not result in siltation of streams or coastal lagoons.

Consistent. As described in Section 10, *Hydrology and Water Quality*, the project would be required to comply with NPDES stormwater management requirements and runoff and pollution control requirements established by Santa Cruz County Code Chapter 7.79. Stormwater management features incorporated into development facilitated by the project would minimize the discharge of pollutants into surface water.

Consistent. As described in Section 6, *Energy*, the project would facilitate development that would include several sustainable design features, including those required by Title 24 and CalGreen standards. The project would also include solar-ready or PV systems.

Consistent. A cultural resources assessment was prepared for the project and is on file at the County offices. As described in Section 5, *Cultural Resources*, the site does not contain historic resources or

review process for all projects with very high site potential as determined by the inventory of archaeological sites, within the Archaeological Sensitive Areas, as designated on General Plan and Local Coastal Program Resources and Constraints Maps filed in the Planning Department.

Source: County of Santa Cruz 1994

structures. Construction activities would have the potential to encounter buried or subsurface pre-historic resources, as well as human remains. Implementation of Mitigation Measures CUL-1 and CUL-2 would ensure that impacts to archaeological resources would be less than significant.

As demonstrated in Table 16, the proposed project would not conflict with applicable County of Santa Cruz General Plan goals and policies adopted for the purpose of avoiding or mitigating an environmental effect. The project site is owned by the County of Santa Cruz and the project would be undertaken by the County; however, the project site is in the City of Watsonville and it is anticipated that future residential development on the site would be subject to City policies. Project consistency with applicable City land use plans is discussed below for informational purposes.

Watsonville General Plan

As described under *Regulatory Setting*, the project site is designated as Public/Quasi-Public by the Watsonville General Plan. Because this land use designation allows government offices and facilities, the County health services building(s) component of the project would be consistent with the site's land use designation. Residential uses are not allowed under this designation; therefore, when a residential development is designed and proposed on the site, a General Plan amendment would be required to change the land use designation of the residential portions of the site to a residential land use. Pursuant to approval of a General Plan amendment for the residential portion of the site, development facilitated by the Master Plan would be consistent with the underlying General Plan land use designations.

Goals and policies in the City of Watsonville General Plan that are relevant to the proposed project are listed in the regulatory settings in Sections 1 through 20 of this Initial Study. Mitigation identified for nesting birds would ensure that the project would not conflict with General Plan policies related to biological resources. Further, mitigation identified for potential cultural, tribal cultural, or paleontological resources would ensure that the project would not conflict with General Plan policies related to such resources. All other project impacts would be less than significant without mitigation. As such, the proposed project would not conflict with applicable General Plan goals or policies adopted for the purpose of avoiding or mitigating an environmental effect.

Watsonville Municipal Code

Pursuant to Title 20 of WMC, the project site is zoned as Public Facilities. This zoning district allows government offices and clinics; therefore, the County health services building(s) component of the project would be consistent with the site's zoning. While some types of residential uses are allowed in this zone, affordable housing projects are prohibited. Chapter 14-46 of WMC, the City's Affordable Housing Ordinance, defines an "affordable unit" as any dwelling unit affordable by income, rent level, and/or sales price to eligible above moderate, moderate, median, low, or very low income households, as further defined in the ordinance. Because 75 percent of the dwelling units facilitated by the Master Plan, or 120 units, would be deed-restricted affordable units, the residential component of the project would be inconsistent with WMC. Therefore, when a residential development is designed and proposed on the site, a rezone would be required to accommodate residential use. Additionally, because the residential part of the site would require a General Plan amendment to change the land use to a residential use, the City's zoning ordinance

must be updated to be consistent with the General Plan. Pursuant to approval of the rezone, the project would be consistent with WMC.

As demonstrated in Table 16 and the above discussion, the proposed project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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12 Mineral Resources

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The California Geological Survey is responsible for classifying land into Mineral Resource Zones under the Surface Mining Control and Reclamation Act (SMARA) based on the known or inferred mineral resource potential of that land. As described in the City of Watsonville’s General Plan, under the SMARA, the State Mining and Geology Board has not designated resources or resources of statewide or regional significance within Watsonville (City of Watsonville 1994).

Regulatory Setting

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The County of Santa Cruz General Plan and Local Coastal Program Conservation and Open Space Element acknowledges that there are important mineral resources within the county. The following objective and policy are applicable to mineral resources in the county (County of Santa Cruz 1994):

Objective 5.16: Mineral Resources. To allow the orderly economic extraction of minerals with a minimal adverse impact on environmental and scenic resources and surrounding residential land uses; to require reclamation of quarry sites concurrently with the extraction of the mineral resource and the completion of quarry operations in any specific area to the greatest extent feasible; and to ensure that the rehabilitation and future use of quarry sites are in accordance with safety, conservation, habitat preservation, restoration and open space values and state mining laws found in PRC section 2710 et. seq. and CCR section 3675-3676.

Policy 5.16.1: Designation of Mineral Resource Areas. Areas classified by the State Geologist and designated by the State Mining and Geology Board as Regionally or Statewide Significant Mineral Resource Areas⁸ and areas classified by the State as MRZ-2 Zones (areas containing

⁸

significant mineral deposits), excluding those areas with existing land uses and/or land use designations which conflict with mineral resource extraction, are shown on the General Plan and Local Coastal Program Resources and Constraints Maps as Mineral Resource lands.

CITY OF WATSONVILLE GENERAL PLAN

The following goal, policy, and implementation measures of the Watsonville General Plan Environmental Resource Management Element are applicable to mineral resources in the city:

Goal 9.9: Mineral resources. Provide for protection and appropriate conservation of economically important mineral resources.

Policy 9.G: Mineral resources. The City shall work in cooperation with the County and State to conserve economically significant mineral deposits including sand and gravel.

Measure 9.G.1: Restoration. The City and County governments shall cooperate to ensure that adequate plans are prepared for landscape restoration following mineral extraction activities within the Watsonville Planning Area.

Measure 9.G.2: Mineral inventory. The City shall work in conjunction with the State Division of Mines and Geology to inventory lands containing economically significant mineral deposits, and to designate appropriate land uses to avoid conflicts.

Impacts Assessment

- a. *Would the project 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. *Would the project 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?*

The project site is currently partially developed with County services buildings and parking and surrounded by existing urban development in Watsonville. The State Mining and Geology Board has not designated any mineral resources within the City of Watsonville under SMARA. Therefore, the project would have no impact on the loss of availability of a known mineral resource.

NO IMPACT

13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Noise Setting

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called “A-weighting” is used to filter noise frequencies that are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the “A-weighted” levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and the abbreviation “dBA” is understood to identify the A weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A 10 dB increase represents a 10-fold increase in sound intensity, a 20 dB increase is a 100-fold intensity increase, a 30 dB increase is a 1,000-fold intensity increase, etc. Similarly, a doubling of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the noise source would result in a 3 dB decrease.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or acoustical energy. Two equivalent noise sources combined do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely

perceive changes of 3 dBA (increase or decrease); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (Caltrans 2013).

Descriptors

The impact of noise is not a function of loudness alone. The time of day and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL). The L_{max} is the maximum noise level reached during a single noise event.

The L_{eq} is the level of a steady sound that, in a specific time period and at a specific location, has the same A-weighted sound energy as the time-varying sound. For example, $L_{eq(1h)}$ is the equivalent noise level over a 1-hour period and $L_{eq(8h)}$ is the equivalent noise level over an 8-hour period. $L_{eq(1h)}$ is a common metric for limiting nuisance noise, whereas $L_{eq(8h)}$ is a common metric for evaluating construction noise.

The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies an additional 5 dBA penalty to noise occurring during evening hours (between 7:00 p.m. and 10:00 p.m.) and an additional 10 dBA penalty to noise occurring during the night (between 10:00 p.m. and 7:00 a.m.). These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night (Crocker 2007).

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of approximately 6 dBA for each doubling of distance. The rate of attenuation can increase above 6 dBA if there are intervening structures or barriers, such as buildings, walls, or topography.

Traffic noise is not a single, stationary point source of sound. Over some time interval, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is 3 dBA for each doubling of distance (Crocker 2007).

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range

(60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean square (RMS) vibration velocity. Particle velocity is the velocity at which the ground moves. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the greatest magnitude of particle velocity associated with a vibration event. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018). Vibration significance ranges from approximately 50 VdB (the typical background vibration-velocity level) to 100 VdB, the general threshold where minor damage can occur in fragile buildings (FTA 2018). The general human response to different levels of groundborne vibration velocity levels is described in Table 17.

Table 17 Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

Source: FTA 2018

Damage to structures occurs when vibration levels range from 2 to 6 in/sec PPV. One half this minimum threshold, or 1 in/sec PPV is considered a safe criterion that would protect against structural damage (Caltrans 2020).

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Ambient Noise Levels

The primary off-site noise sources in the project site vicinity are motor vehicles (e.g., automobiles, buses, and trucks) along Freedom Boulevard, Crestview Drive, and Madison Street. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create sustained noise levels. Ambient noise levels are generally highest during the daytime and rush hour (also referred to as peak hour) unless congestion slows traffic speeds substantially.

Rincon conducted five ambient noise level measurements at the project site on July 1, 2022. The measurements were conducted at the following locations:

- The northwestern corner of the project site along Freedom Boulevard
- The southwestern corner of the project site at the intersection of Freedom Boulevard and Crestview Drive
- The southeastern corner of the project site at the intersection of Crestview Drive and Madison Street
- The northeastern corner of the project site along Madison Street
- Near the center of the project site between existing County services and office buildings.

The noise measurements were conducted using a calibrated noise meter for a period of 15 minutes each, with the first measurement beginning at 7:56 a.m. and the last measurement concluding at 9:22 a.m. This time period was selected because the predominant noise source in the area is roadway traffic, and traffic is generally greatest during AM and PM peak hours. The measurement results, which are included as Appendix E to this Initial Study, indicated the ambient noise level on the project site is approximately 60 L_{eq} .

Sensitive Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive receivers generally include residences, parks, schools, and churches (City of Watsonville 1994). The predominant noise- and vibration-sensitive land use in closest proximity to the project site is the multi-family residential building located immediately northeast of the project site and approximately 400 feet from the center of the project site. Other noise-sensitive uses nearby include the single-family residences immediately east of the project site across Madison Street, and the cemetery immediately northwest of the site.

Regulatory Setting

Local

SANTA CRUZ COUNTY GENERAL PLAN AND LOCAL COASTAL PROGRAM

The 1994 General Plan and Local Coastal Program included a Public Safety and Noise Element, which has recently been preempted by the adoption of a stand-alone Noise Element, Chapter 9 of the General Plan. The Noise Element contains updated goals, objectives and policies intended to protect citizens from exposure to excessive noise. The Noise Element establishes standards and policies to promote compatible noise environments for new development or redevelopment projects and to control excessive noise exposure of existing land uses. The following objectives, policies and standards listed below are applicable to the proposed project. Please note that the policies listed below are reproduced directly how they are stated in the Noise Element. The Noise Element policies utilize dBA but were incorrectly printed in the Noise Element as dB.

Objective 9.2: Noise Exposure of Existing Sensitive Uses and Receptors. Minimize exposure of existing noise-sensitive land use and receptors to excessive, unsafe, or disruptive noise that may be generated by new land uses and development projects.

Policy 9.2.1. Require acoustical studies for all new development projects that may affect the existing noise environment affecting sensitive land uses and receptors and that may not conform to the Normally Acceptable Noise Exposure in Table 9-2.

Policy 9.2.2. Require site-design and noise reduction measures for any project, including transportation projects that would cause significant degradation of the noise environment due to project effects that could:

- a) Increase the noise level at existing noise-sensitive receptors or areas by 5 dB or more, where the post-project CNEL or DNL will remain equal to or below 60 dB;
- b) Increase the noise level at existing noise-sensitive receptors or areas by 3 dB or more, where the post-project CNEL or DNL would exceed 60 dB.

This policy shall not be interpreted in a manner that would limit the ability of the County to require noise-related mitigation measures or conditions of approval for projects that may generate lesser increases than the above. Special consideration may also be applied to special events or activities subject to permit requirements, or to land use development permits for uses and activities exempted from County noise control regulations.

Policy 9.2.3. Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

Policy 9.2.4. For all new commercial and industrial developments which would increase noise levels above the normally acceptable standards in Table 9-2 or the maximum allowable standards in Table 9-3 (see Table 18), the best available control technologies shall be used to minimize noise levels. In no case shall the noise levels exceed the standards of Table 9-3 (see Table 18).

Policy 9.2.5. The following noise mitigation strategies are preferable to construction of conventional masonry noise barriers where these strategies are a feasible option to reduce impacts on sensitive uses:

- Avoid placement of noise sensitive uses in noisy areas
- Avoid placement of significant noise generators in noise sensitive areas
- Increase setbacks between noise generators and noise sensitive uses
- Orient buildings such that the noise sensitive portions of a project (e.g., bedrooms) are shielded from noise sources (such as through careful design of floor plan)
- Use sound attenuating architectural design and building features
- Employ technologies that reduce noise generation, such as alternate pavement materials on roadways, when appropriate
- Employ traffic calming measures where appropriate

Policy 9.2.6. Require mitigation and/or best management practices to reduce construction noise as a condition of project approvals, particularly if noise levels would exceed 75 dB at neighboring sensitive land uses or if construction would occur for more than 7 days.

Table 18 Maximum Allowable Noise Exposure – Stationary Sources¹

	Daytime (7:00 a.m. to 10:00 p.m.) ²	Nighttime (10:00 p.m. to 7:00 a.m.) ^{2,3}
Hourly Leq – average hourly noise level, dB ⁴	50	45
Maximum noise level, dB ⁴	70	65
Maximum noise level, dB – Impulsive Noise ⁵	65	60

¹ As determined at the property line of the receiving land use. When determining effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property line noise mitigation measures.

² Allowable levels shall be raised to the ambient noise level where the ambient level exceeds the allowable levels. Allowable levels shall be reduced by 5 dBA if the ambient hourly Leq is at least 10 dBA lower than the allowable level.

³ Applies only where receiving land use operates or is occupied during nighttime hours.

⁴ Sound level measurements shall be made with “slow” meter response.

⁵ Sound level measurements shall be made with “fast” meter response.

Source: County of Santa Cruz 2020, Table 9-3

SANTA CRUZ COUNTY CODE

The Santa Cruz County Code contains additional guidance with the intent to control noise, to promote and maintain the health, safety and welfare of its citizens. Chapter 8.30 of the Santa Cruz County Code enumerates general standards, limitations and exemptions pertaining to noise within the County. Additionally, Chapter 13.15 institutes “Noise Planning,” which codifies General Plan policies and aids in regulating noise throughout the County through land use planning and permitting. The regulations are presented below.

Section 8.30.10 Offensive Noise

- (A) No person shall make, cause, suffer, or permit to be made any offensive noise.
- (B) “Offensive noise” means any noise which is loud, boisterous, irritating, penetrating, or unusual, or that is unreasonably distracting in any other manner such that it is likely to disturb people of ordinary sensitivities in the vicinity of such noise, and includes, but is not limited to, noise made by an individual alone or by a group of people engaged in any business, activity, meeting, gathering, game, dance, or amusement, or by any appliance, contrivance, device, tool, structure, construction, vehicle, ride, machine, implement, or instrument.
- (C) The following factors shall be considered when determining whether a violation of the provisions of this section exists: loudness, night hours, pitch, duration of the sound, time of day or night, necessity of the noise, level of customary background noise, and proximity to any building regularly used for sleeping purposes.
- (D) Prior to issuing a citation for this section, the responsible person or persons will be warned by a law enforcement officer or other designated official that the noise at issue is offensive and constitutes a violation of this chapter. A citation may be issued if, after receiving the warning, the responsible person(s) continues to make or resumes making the same or similar offensive noise(s) within three months of the warning. Notwithstanding the

provisions of subsection (C)(1) of this section, enforcement of violations under this chapter shall not require the use of a sound level meter.

Section 13.15.040 Exemptions

Section 13.15.040 of the Santa Cruz County Code exempts construction noise provided a permit has been obtained from the County, and provided that construction occurs between the hours of 8:00 a.m. and 5:00 p.m. on weekdays (unless the Building Official has in advance authorized construction to start at 7:00 a.m. and/or continue no later than 7:00 p.m.). Construction is not permitted on Saturdays unless authorized by the Building Official, and provided construction take place between 9:00 a.m. and 5:00 p.m. and on no more than three Saturdays per month. Construction shall not take place on Sunday or a federal holiday unless authorized in advance by the Building Official on a Sunday or federal holiday, or during earlier morning or later evening hours of a weekday or Saturday.

Section 13.15.050 General Noise Regulations and Unlawful Noise

Section 13.15.050 of the Santa Cruz County Code prohibits any use, except a temporary construction operation, to create noise which is found by the Planning Commission not to conform to the noise parameters established by Table 9-3 (see Table 18) of the Santa Cruz County General Plan beyond the boundaries of the project site.

Backup emergency generators are exempt during power outages and for other temporary purposes. If a generator is located within 100 feet of one or more residential dwelling units, noise attenuation measures shall be included to reduce noise levels to a maximum exterior noise level of 60 dBA at the property line and a maximum interior noise level of 45 dBA within nearby residences.

Section 13.15.060 Special Requirements for Air Conditioning/Mechanical Units in or Near Residential Uses

Section 13.15.060 of the Santa Cruz County Code limits the noise level for air conditioning/mechanical units within 100 feet of buildings used for sleeping purposes to 60 dBA, as measured at the property line, for units installed before adoption of Section 13.15.060 of the Santa Cruz County Code and 55 dBA, as measured at the property line, for units installed after the adoption of Section 13.15.060 of the Santa Cruz County Code. Maximum interior noise level is limited to 45 dBA within nearby residences. The section also requires that air conditioning/mechanical units be located away from rooms used for sleeping purposes and incorporation of sound attenuation measures as feasible.

CITY OF WATSONVILLE GENERAL PLAN

Although the project would be undertaken by the County of Santa Cruz and occur on County-owned land, the project would occur within the City of Watsonville. The Watsonville General Plan establishes interior and exterior noise standards and thresholds for different land uses within the City, as shown below in Table 19.

Table 19 City of Watsonville Noise and Land Use Compatibility Guidelines

Land Use Category	Community Noise Exposure (Ldn or CNEL, dB)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential: single-family, duplex, mobile homes	<60	55-75	75-80	80<
Residential: multi-family	<65	60-75	75-80	80<
Transient lodging: motel, hotel	<70	60-75	75-85	85<
Schools, libraries, churches, hospitals, nursing homes	<75	60-75	75-85	85<
Auditoriums, concert halls, amphitheaters	NA	<75	NA	75<
Sports arena, outdoor spectator sports	NA	<80	NA	75<
Playground, neighborhood park	<75	NA	72.5-80	75<
Golf course, stable, water recreation, cemetery	<80	NA	75-85	85<
Office building, business, commercial and professional	<75	72.5-85	80<	NA
Industrial, manufacturing, utilities, agriculture	<80	75-85	85<	NA

dB = decibel
Ldn = day-night average sound level
CNEL = Community Noise Equivalent Level
Source: City of Watsonville 1994

In addition, the following goals, policies, and implementation measures of the Watsonville General Plan are applicable to the 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 improvements 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.

Measure 12.M.1: Traffic noise. The City shall enforce provisions of the California Vehicle Code and local ordinances to reduce vehicular noise intrusion in residential areas and near other noise sensitive land uses such as schools and hospitals.

Measure 12.M.2: Truck routes. The City shall continue efforts to designate truck routes that bypass residential areas and other noise sensitive areas.

Measure 12.M.4: Soundproofing. The City shall use the development review process and provisions of the Uniform Building Code to ensure adequate levels of soundproofing in all new construction.

Measure 12.M.6: Site planning. The City shall evaluate site orientation and building design to decrease the potential for noise intrusion, using the noise contour map and compatibility guidelines.

Measure 12.M.7: Aircraft noise. The City shall periodically review and update noise contour measurements as aircraft operations increase or change in nature. Recommendations for noise attenuation contained in the Watsonville Airport Master Plan shall be implemented on a project-by-project basis.

WATSONVILLE MUNICIPAL AIRPORT MASTER PLAN

The Watsonville Municipal Airport Master Plan, adopted in June 2003, projected possible noise contours through the year 2020 and evaluated acceptable land uses within these noise contours. The project site is partially overlain by the projected 2020 Watsonville Municipal Airport 55 dB CNEL noise contour. Table 36 of the Watsonville Airport Master Plan determined that residential and office land uses are compatible without restriction in areas that experience a CNEL of 65 dB or less.

CITY OF WATSONVILLE MUNICIPAL CODE

The City regulates noise by Chapter 8 of WMC. Section 5-8.01 prohibits the generation of noise which annoys, disturbs, or endangers the comfort, repose, health, peace, or safety of others on residential property or public ways within the City. While some zoning districts in WMC have specific noise restrictions, the Public Facilities zoning district does not. WMC does not establish quantitative noise limits for demolition or construction activities occurring in the City.

Impacts Assessment

- a. *Would the project result in generation of a 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?*

Construction

METHODOLOGY

Construction noise levels in the project vicinity would fluctuate depending on the type, number, and duration of usage for the various pieces of equipment. The effects of construction noise depend largely on the types of construction activities occurring on a given day, noise levels generated by those activities, distances to noise-sensitive receivers, and the existing ambient noise environment in the vicinity of the receptors. Construction generally occurs in several discrete stages, with each stage varying the equipment mix and equipment usage rates. These construction stages alter the characteristics of the noise environment generated on the project site and in the surrounding community for the duration of the construction stage. Construction stages for development of this project were assumed to include site preparation, grading, building construction, paving, and painting (architectural coating). Construction stages also include demolition, such as demolition of the existing County office buildings.

For purposes of construction noise assessment, construction equipment can be considered to operate in two modes, stationary and mobile. Generally, stationary equipment operates in one location for one or more days at a time, with either a fixed-power operation, such as, pumps, generators, and compressors, or a variable noise operation, such as pile drivers, rock drills, and

pavement breakers. Mobile equipment moves around the construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts for mobile construction equipment are assessed from the center of the equipment activity area (i.e., construction site).

Although specific construction requirements for build-out of the proposed project are currently unknown because the development envisioned in the Master Plan is not designed or engineered, it is anticipated that typical construction sources such as backhoes, compressors, bulldozers, excavators, loaders and other related equipment would be utilized during project construction. Based on the reference noise levels, usage rates, fleet mixes and operational characteristics discussed above, overall hourly average noise levels attributable to project construction activities were calculated for the project. Construction noise levels were predicted using reference noise emission data and operational parameters contained in the FHWA Roadway Construction Noise Model and the FTA guidance manual.

Construction activities on the project site may result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Groundborne vibration attenuates rapidly, even over short distances. The attenuation of groundborne vibration as it propagates from source to receptor through intervening soils and rock strata can be estimated with expressions found in FTA and Caltrans guidance.

For purposes of this analysis, City of Watsonville noise standards and thresholds were used rather than County thresholds. This is because the project is located in Watsonville and the sensitive noise receptors near the project site are in the City limits. Noise thresholds for temporary construction are not provided in the City's General Plan or Municipal Code; however, the noise level threshold for speech interference indoors is 45 dBA (U.S. EPA 1974). Assuming a 15-dBA exterior-to-interior reduction for standard residential construction and a 25-dBA exterior-to-interior reduction for standard commercial/industrial construction, this would correlate to an exterior threshold of 60 dBA Leq. Additionally, temporary construction noise would be annoying to surrounding land uses if the ambient noise environment increased by at least 5 dBA Leq for an extended period of time. Therefore, the temporary construction noise impact would be considered significant if project construction activities exceeded 60 dBA Leq at nearby residences or exceeded 70 dBA Leq at nearby commercial land uses and exceeded the ambient noise environment by 5 dBA Leq or more for a period longer than one year.

ANALYSIS

The project would generate temporary construction noise during demolition, site preparation, grading, building construction, paving, and architectural coating activities. The site preparation and grading stages would generate the most substantial noise levels due to clearing, grading, compacting, and excavating of the site, which utilizes the loudest mix of construction equipment. Heavy construction equipment utilized during site preparation and grading stages typically includes backhoes, dozers, loaders; excavation equipment such as, excavators, graders, and scrapers; and compaction equipment. Table 20 lists the noise levels typically generated by various types of construction equipment. Impact pile-driving and blasting are not anticipated to be required for construction of the proposed project because the project involves traditional health services building and residential construction, neither of which typically involve pile foundations or blasting. Additionally, the project includes redevelopment of an already developed, urban site, and therefore there are no rock outcrops or other reason that blasting would be expected for construction.

Table 20 Construction Equipment Noise Levels

Equipment Type	Noise Level (Lmax, dBA at 50 feet)
All other equipment > 5 horsepower	85
Backhoe	78
Compressor (air)	78
Concrete Saw	90
Crane	81
Dozer	82
Excavator	81
Front End Loader	79
Generator	72
Grader	85
Man Lift	75
Paver	77
Roller	80
Scraper	84
Tractor	84
Welder/Torch	73

Source: FTA 2018

As shown in Table 20, noise levels for typical construction activities would generate maximum noise levels ranging from 72 to 90 dBA at a distance of 50 feet. The nearest sensitive receiver is approximately 400 feet from the center of the project site. Noise would attenuate over this distance, and the noise level experienced by the apartment building to the northeast, which is the nearest sensitive receptor, would be approximately 72 dBA (Appendix E). This would be a temporary increase in ambient noise levels, which were measured to be approximately 60 dBA L_{eq} .

Construction would occur during daytime hours, when most people are awake or away from their residences at places of employment, and less sensitive to noise. Additionally, construction stages that generate the most noise, such as grading, excavation, and building framing, would occur only during parts of the overall construction period. Other parts of construction, such as interior floor work, would generate less noise. Therefore, impacts related to construction noise would be less than significant.

Operation

The project would generate operational noise that would be typical of office and residential uses, such as vehicle traffic, landscaping activities, and voices, as examples. Another example would be heating, ventilation, and cooling (HVAC) equipment, such as central air conditions units that are mounted outside of but on or adjacent to residential building. The types of residential noises produced by the project would be similar in character to the existing noise environment associated with surrounding residential uses, as well as existing on-site uses, such as HVAC used in the existing on-site County buildings. Similarly, the existing cemetery northwest of the site also produces residential-like noises because operation and maintenance involves landscaping activities and people talking. Noise generated by the County health services building(s) would be similar to the existing health services operated on the site, as well as existing commercial uses south and west of

the project site, including vehicle traffic and speech, as examples. These general office and residential noises would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project because these types of noises sources are present as the ambient noise environment. Further, the existing County offices within the project site currently noise associated with office uses, and the proposed County health services building(s) would not substantially increase the level of these noises.

The proposed potential parking garage would also generate noise associated with vehicle parking. Activities making up a single parking event included vehicle arrival, limited idling, occupants exiting the vehicle, door closures, conversations among passengers, occupants entering the vehicle, and vehicle startup and departure. Maximum sound levels generated by car doors closing, trunk closure, engine start up, car pass-by and tire squeal have been measured to produce sound levels of 63 to 69 dBA Lmax at a distance of 50 feet (Bayer 2007). The parking structure design would include partial height walls for safety that would provide shielding of the parking activities at the nearby receptors, reducing the maximum sound levels by 5 to 7 dBA at lower to higher floors, respectively. Therefore, the approximately 60 dBA noise levels at of the garage, accounting for walls, would be similar to ambient noise levels in the area.

As described in the *Existing Setting* discussion above, vehicle traffic on Freedom Boulevard, Crestview Drive, and Madison Street are the predominant source of ambient noise at the project site and the adjacent sensitive noise receivers. According to the Transportation Analysis prepared for the project, the proposed project would generate less than 200 vehicle trips on Freedom Boulevard during PM peak hour, and even fewer during AM peak hour. Generally, a doubling of traffic volume is required for a 3 dBA increase in traffic noise, and 3 dBA is the threshold by which the human ear can discern a noise increase. Because Freedom Boulevard currently has more than 2,500 vehicle trips near the project site during the PM peak hour, the additional approximately 200 trips generated from the project would not double traffic volumes on Freedom Boulevard. Accordingly, operational noise impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

METHODOLOGY

Construction vibration levels were calculated at the receptors nearest to the project site, which are the multi-family residences immediately northeast of the project site, to determine whether project construction would generate vibration levels that would cause human annoyance or physical damage to nearby structures. Vibration levels were estimated for construction equipment expected to be used during project construction and were based on the vibration source levels for construction equipment from the FTA Transit Noise and Vibration Assessment (2018). Construction vibration levels were modeled at a distance of 400 feet. 400 feet was used because that is the approximately distance between the center of the project site and existing multifamily residences adjacent to the site.

Project construction would not involve activities typically associated with excessive groundborne vibration such as pile driving or blasting. However, construction would involve the use of other heavy machinery that generates vibration, such as vibratory rollers, bulldozers, and jackhammers. Project construction would occur immediately adjacent to existing residential buildings. As shown in Table 21, vibration levels from individual pieces of construction equipment would not exceed the

threshold at which damage can occur to residential buildings, 0.20 in/sec PPV, or the threshold at which damage can occur to historic structures, 0.08 in/sec PPV. Construction vibration levels at all other buildings in the immediate vicinity, including residences to the west and north, would be less than the levels shown in Table 21, because vibration levels would attenuate with distance. Furthermore, project construction would be required to occur during daytime hours and would not disturb off-site residences during sensitive nighttime hours when most people typically sleep. Construction vibration impacts would be less than significant.

Table 21 Vibration Levels at Sensitive Receivers

Equipment	PPV at 400 feet (nearest residences)
Vibratory Roller	0.0099
Hoe Ram	0.0042
Large bulldozer	0.0042
Caisson drilling	0.0036
Loaded trucks	0.0017
Jack hammer	0.0001
Small bulldozer	0.0042

Calculations included in Appendix E
 Source: FTA 2018

Operation

As a health services building and residential development with associated parking, the proposed would not generate significant sources of vibration, such as manufacturing or heavy equipment operations. Additionally, similar health services currently operate on the site, and redevelopment of the health services building, or buildings would not generate new operational sources of vibration. Therefore, operation of the project would have no impact related to vibration.

LESS THAN SIGNIFICANT IMPACT

- 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?*

The project site is located approximately 1.2 miles southeast of Watsonville Municipal Airport. The project site is not within land use plan boundaries of the airport; however, the site is partially within the airport’s noise contour for a CNEL of 55 dBA associated with aircraft noise (City of Watsonville 2003). The Watsonville Municipal Airport Master Plan determined that residential and office uses are acceptable in areas that experience a CNEL of 65 dBA or lower. Further, as shown in Table 19, the Watsonville General Plan determined that office uses are normally acceptable in areas that experience a CNEL of 75 dB or lower, and that multi-family residential uses are normally acceptable in areas that experience a CNEL of 65 dB or lower. Therefore, office and residential uses are compatible with the relatively low, anticipated levels of airport noise, and the project would not expose residents or workers in the project area to excessive noise levels. Additionally, existing

conditions on the project site include workers and airplane noise, and therefore, the health services development envisioned in the Master Plan would not substantially change exposure of workers to on-site noise. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14 Population and Housing

	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 (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

According to the California Department of Finance (DOF) population and housing estimates, the population of Watsonville was 50,669 as of January 2022, with 14,655 housing units and an average of 3.52 persons per household (DOF 2022). As discussed in Section 4.3, *Air Quality*, AMBAG’s 2045 MTP/SCS projects that Watsonville will have a population of 56,344 by 2045, an increase of 5,675 residents from 2022. AMBAG also projects that Watsonville will have 16,519 housing units by 2045, an increase of 1,864 housing units in 2022 (AMBAG 2022). City population and housing units are presented in this section because the project site is in the limits of the City of Watsonville, and therefore future occupants of the residential component would become part of the City’s population.

Regulatory Setting

Regional

ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

AMBAG allocates regional housing needs to each city and county within Santa Cruz, Monterey, and San Benito counties based on statewide goals. California’s Housing Element Law requires cities to: 1) zone adequate lands to accommodate its Regional Housing Needs Allocation (RHNA); 2) produce an inventory of sites that can accommodate its share of the regional housing need; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and work plans to mitigate or eliminate those constraints; and 5) adopt a housing element that is to be updated on a regular recurring basis.

Local

COUNTY OF SANTA CRUZ HOUSING ELEMENT

The County's Housing Element serves as its framework for housing goals, policies, and detailed programs for meeting existing and future housing needs and for increasing affordable housing opportunities. The current Housing Element addresses the planning period from 2016 to 2023, as required by the State Housing Element Law. The Housing Element guides decisions to facilitate the development, rehabilitation, and availability of housing in the County. It includes the following six primary goals:

1. Ensure land is available to accommodate an increased range of housing choices, particularly for multi-family units and smaller-sized units
2. Encourage and assist in the development of housing
3. Remove unnecessary governmental constraints to housing
4. Preserve and improve existing housing stock and expand and preserve the continued availability of the County's existing affordable housing
5. Promote equal opportunity and production of special needs housing units
6. Promote energy efficiency in existing and new residential structures

CITY OF WATSONVILLE HOUSING ELEMENT

The City's 2015-2023 Housing Element, adopted in 2016, is an element of the City's General Plan that contains an assessment of the amount, type, and phasing of development needed to achieve the City's social, economic, and environmental goals related to housing. Consistent with the objectives of AMBAG's 2045 MTP/SCS, the City's Housing Element has the following objectives (City of Watsonville 2016):

- Preserving and improving housing and neighborhoods
- Providing adequate housing sites
- Assisting in the provision of affordable housing
- Removing governmental and other constraints to housing investment
- Promoting fair and equal housing opportunities especially for persons with developmental disabilities

Impacts Assessment

- a. *Would the project 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)?*

The proposed project envisions one or more County health services buildings, encompassing 70,000 to 85,000 square feet, and one or more residential buildings with 160 residential units on the site, as well as parking in either a new garage or surface parking, or both. The project is in an already developed area and would not include an extension of roads or other infrastructure. Additionally, the health service building or buildings are consistent with existing development on-site because the County currently operates several buildings on-site. As shown in Section 4.3, *Air Quality*, the US Green Building Council estimates that for medical office uses, there is approximately one employee per 225 square feet (US Green Building Council 2008). Further, according to the California

Department of Finance (DOF), the City of Watsonville has an average of 3.52 persons per household (DOF 2022). Applying these average occupancy rates to estimate buildout facilitated by the Master Plan, implantation of the project is projected to result in approximately 378 employees associated with the County health services building(s) and approximately 563 residents associated with the residential building(s).

The employment growth forecasts in AMBAG's 2045 MTP/SCS estimate that the number of jobs in Watsonville would be 30,303 in 2045, up 1,789 jobs from a job number of 28,514 in 2020. AMBAG's 2045 MTP/SCS also projects that Watsonville will have a population of 56,344 by 2045, an increase of 4,829 residents from 51,515 in 2020 (AMBAG 2022). The increase of 378 jobs would be within AMBAG's projected employment increase of 1,789 jobs between 2020 and 2045 for Watsonville. Also, the estimated 378 jobs would largely be filled by existing County staff, as the health services buildings envisioned in the Master Plan would replace the existing health services building on-site. The projected increase of approximately 563 residents would be within the projected population increase of 4,829 Watsonville residents between 2020 and 2045. Therefore, the project would not directly or indirectly induce substantial unplanned population growth. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site does not contain existing residential development, and future construction of County health services building(s) and residential building(s) on the project site would not result in the removal of existing housing or displacement of existing residents. There would be no impact.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. 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:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Fire protection services are provided to the project site by the Watsonville Fire Department (WFD), which serves the City of Watsonville and the surrounding area through mutual aid. WFD serves an area of approximately 14 square miles and an estimated population of 60,000 (WFD 2021a). WFD responds to fires, hazardous materials spills, and medical emergencies (including injury accidents) in the project area. WFD operates two fire stations in the city; the closest fire station to the project site is Station 1, located at 115 Second Street, approximately 1.5 miles (driving distance) from the project site. Station 2 is located at 370 Airport Boulevard, approximately 2.4 miles (driving distance) from the project site (WFD 2021b).

Police protection services are provided to the project site by the Watsonville Police Department (WPD). Officers are dispatched from police headquarters, located at 215 Union Street, approximately 1.4 miles (driving distance) from the project site (WPD 2021).

The project site is located within the Pajaro Valley Unified School District (PVUSD), which operates 16 elementary schools, six middle schools, three high schools, eight charter and alternative schools, and one adult education school (PVUSD 2022). The closest schools to the project site are H.A. Hyde Elementary School, Cesar Chavez Middle School, and Watsonville High School.

The City Parks and Community Services Department manages approximately 143 acres of parkland across 26 parks in Watsonville. Parkland includes community parks, neighborhood parks, pocket parks, and school properties. The nearest parks to the project site include the facilities at H.A. Hyde Elementary School 0.2-mile west of the site, Crestview Park 0.3 mile east of the site, and Flodberg Park 0.4-mile southwest of the site. The City also maintains several trails alongside Struve Slough; the nearest trail entrance to the project site is approximately 0.6 mile west of the project site (City of Watsonville 2021b).

Other public facilities evaluated in this section of the Initial Study include public libraries. The Watsonville Public Library operates its Main Branch at 275 Main Street, approximately 1.4 miles southeast of the project site. The Watsonville Public Library also has its Freedom Branch, which is located at 2021 Freedom Boulevard, approximately 1.6 miles northwest of the project site.

Regulatory Setting

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The County's General Plan provides a framework for development and growth in the county (Santa Cruz County 1994). The Parks, Recreation and Public Facilities Element includes objectives and policies for the adequate provision of public services to support existing and future populations. The following objectives and policies pertaining to public services are relevant to this analysis:

Objective 7.1a: Parks and Recreation Opportunities. To provide a full range of public and private opportunities for the access to, and enjoyment of park, recreation, and scenic areas, including the use of active recreation areas and passive natural open spaces by all ages, income groups and people with disabilities with the primary emphasis on needed recreation facilities and programs for the citizens of Santa Cruz County.

Objective 7.1b: Park Distribution. To establish and maintain, within the economic capabilities of the County, a geographical distribution of neighborhood, community, rural, and regional park and recreational facilities throughout the County based on the standards for acreage and population ratios contained in the Santa Cruz General Plan; and to preserve unique features of the natural landscape for public use and enjoyment.

Objective 7.2 Neighborhood Parks. To provide neighborhood parks, at a standard of 3 net useable acres per 1000 population, consisting of conveniently located, easily accessible parks serving local residential neighborhoods in the urban portion of the County.

Objective 7.3: Community Parks and Recreation Facilities. To provide community recreation facilities as a standard of 2-3 net useable acres per 1,000 population, including parks, cultural centers, and community complexes, in the central locations in the urban areas which will serve as focuses for community social, organizational, cultural and/or recreational activities.

Objective 7.12 School Facilities. To ensure that adequate school facilities and services are provided as an essential public services prerequisite to any increase in residential development which would include school-age or potential school-age children and to alleviate current critical school shortages.

Policy 7.12.1 Mitigating Impacts from New Development. Prior to issuance of any building permit, require a written statement confirming payment in full of all applicable developer fees and other requirements lawfully imposed by each school district in which the project is located.

Prior to approval of any land division or other discretionary development permit application for a project which would authorize additional development, consider the impact of such action on each school district in which the project is located. Require feasible mitigation measures permitted by law to reduce any significant impacts on the school system or approve the project on the basis of a statement of overriding considerations.

Prior to approval of any General Plan and/or Local Coastal Program Amendment, Rezoning, or other legislative action which would authorize additional development to occur as a matter of land use policies, consider the impact of such action on each school district within which the land is located. Either require feasible mitigation measures to reduce any significant impacts on each school district to a level of insignificance, deny the project if such mitigation measures are infeasible, or approve the project on the basis of a statement of overriding conditions.

Mitigation measures may include, by way of example only, the reduction of residential densities or the controlled phasing of residential development within attendance areas of the school district having inadequate facilities or services.

Objective 7.16 Fire Protection. To provide the highest level of fire protection service feasible in the rural areas considering the difficult terrain, disperse settlement patterns, and limited road and water improvements and to provide an urban level of fire service in the urban areas.

Policy 7.16.1. Reviewing New Development for Fire Protection. Require review of all new developments, including building permits on existing parcels of record, by the County Fire Marshal or local fire agency, and require adequate access, water supply and location with respect to fire stations and Critical Fire Hazard Areas in order to ensure adequate fire protection.

Policy 7.16.2 Development to be Consistent with Fire Hazards Policies. Allow development approvals only if adequate water supply, access, and response time for fire protection can be made available in accordance with the Fire Hazards policies found in section 6.5 (of the General Plan).

Objective 7.17 Police Protection. To provide the highest level of police protection services to County residents and property in the unincorporated areas of Santa Cruz County.

Policy 7.17.2 Maintaining Adequate Levels of Service. Provide adequate levels of police service to protect County residents and businesses.

SANTA CRUZ COUNTY PARKS DEPARTMENT STRATEGIC PLAN

The Santa Cruz County Parks Department Strategic Plan (Santa Cruz County 2018) provides a 10-year roadmap for the department that will assist in adapting and growing the support for a healthy, connected, and culturally vibrant Santa Cruz County. It also creates a resource for understanding what the department does and how the department serves the community. The plan provides guidance for partnering and collaborating with other relevant agencies, describes a collective vision for the County Parks Department, and establishes goals and objectives within the 10-year time frame. The goals of the plan include maintaining and enhancing the quality of parks facilities and improving access between existing parks and programs.

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville General Plan Public Facilities and Services Element and Public Safety Element include goals, policies, and implementation measures for various public services, including fire and police services, education, parks, libraries, and other public services. Applicable goals, policies, and measures are listed below:

Public Facilities and Services Element

Goal 11.1: Service availability. Maintain or increase the current availability of public services and facilities consistent with projected population growth in the City limits and Sphere of Influence and according to the fiscal resources of the City.

Goal 11.2: Public services. Assure new development can be served by adequate public services and facilities.

Goal 11.6: Library services. Continue to improve the present library facility and services. Explore the development of a second facility to serve population growth in the eastern and northern portions of the city and Sphere of Influence.

Goal 11.8: Public safety. Maintain public protection service levels consistent with City standards for acceptable risk levels.

Policy 11.A.3: Development fees. The City shall maintain a schedule of development impact fees that is commensurate with the increased need for public services and facilities generated by new development.

Measure 11.B.3: Incremental costs. The City shall require that new development projects pay additional incremental public service costs which they generate.

Policy 11.H: Library services. The City shall maintain and improve library services for residents of the City of Watsonville.

Policy 11.I: Joint planning. The City shall continue to work closely with the Pajaro Valley Unified School District in planning for all facets of school site acquisition and facilities development. The City shall encourage the development of advanced educational facilities in and near Watsonville.

Measure 11.J.9: Response time. The City shall strive to provide properly staffed and equipped fire stations to provide a response time of four minutes or less from the nearest fire station to all portions of the city as measured by the Fire Chief, except for residential neighborhoods which have Fire Department approved built-in protection. There would be a special planning effort by the Fire Department to provide a four to six minute response time for a first response for emergency medical service.

Measure 11.J.16: Built-in fire protection. The Fire Department shall pursue methods of encouraging the installation of built-in fire protection such as automatic fire sprinkler systems and fire alarm systems. Local ordinances requiring built-in protection should be strengthened for defined residential and commercial hazards.

Public Safety Element

Goal 12.4: Fire safety/protection. Ensure that all existing structures in the city are maintained at adequate levels of fire suppression standards, that new structures conform to current fire safety

standards, and the coordination is maintained between urban and rural fire districts for the prevention and suppression of structural and wildland fires.

Measure 12.F.1: Access. The City shall require that new driveways and roadways meet minimum standards of the Uniform Fire Code or subsequent standards established by city ordinances.

Measure 12.F.8: Fire flow. New development shall be conditioned to provide adequate water for fire suppression in accordance with city standards for minimum volume and duration of flow.

Measure 12.F.11: Built-in fire protection. The City shall continue to promote the installation of built-in fire extinguishing systems and early warning fire alarm systems. The City acknowledges that fact that built-in fire protection is a better substitute than expanding public fire protection services.

Measure 12.H.1: Level of service. The City shall strive to provide properly staffed and equipped fire stations to provide a response time of four minutes from the nearest fire station to all portions of the city as measured by the Fire Chief, except for the following: residential neighborhoods having no special fire hazard or special populations having a medical related problem, i.e. convalescent homes and senior housing, which may install an approved fire sprinkler system to substitute for the fire station location in the area between four and seven minute response time.

Measure 12.H.5: Fire apparatus. The City shall maintain apparatus and equipment necessary to accomplish an aggressive and effective initial attack, as well as to prevent conflagration.

Measure 12.H.6: Financing. New development shall be required to contribute a proportional share of the cost of constructing and equipping additional fire stations.

Policy 12.I: Crime prevention. The City shall provide sufficient funding, adequate personnel levels, and necessary equipment to maintain civil order and prevent crime.

Measure 12.I.2: Project security review. The City shall refer new development projects to the Police Department for a security review. This review shall include, but not be limited to:

- The provision of adequate lighting for personal security
- The provision of adequate locking devices for windows and doors
- The location of walkways and access points

CITY OF WATSONVILLE PARKS AND RECREATION FACILITIES MASTER PLAN

The City of Watsonville adopted its Parks and Recreation Facilities Master Plan in 2009. The master plan is an overarching plan for the development and implementation of future parks and recreational opportunities. The master plan established Goal 1-3, which aims to provide five acres of parkland per 1,000 residents in Watsonville (City of Watsonville 2009).

Impacts Assessment

- a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

Although the project site is owned and operated by the County, the site is in the City of Watsonville and WFD currently serves the area. WFD would continue to provide fire protection services to the project site. As discussed in Section 14, *Population and Housing*, the proposed project would include construction of up to 160 residential units, up to 85,000 square feet of County health service uses, and would result in a population increase of approximately 941 residents and employees. However, as discussed in Section 14, *Population and Housing*, jobs would largely be filled by existing County staff as the health services buildings envisioned in the Master Plan would replace the existing health services building on-site. Further, the residential units would largely be occupied by existing Watsonville or Santa Cruz County residents. Development facilitated by the project would be reviewed by WFD and would be required to comply with WFD conditions and recommendations, including fire clearances or fire lanes around proposed buildings and the provision of fire sprinkler systems. Because the project does not include a significant increase to the population of the City or County and would be required to comply with fire district building conditions, it would not result in increased demand for fire services on the site. Additionally, the project site is an urban area of the City where there are already existing residential buildings of similar size and height, which would not require expansion of the WFD service area or additional specialized equipment, such as new fire engines with taller ladders. Therefore, the project would not result in the need for new or physically altered fire facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

WPD currently serves the area and would continue to provide police protection services to the project site. As discussed in Section 14, *Population and Housing*, the project would result in a population increase of approximately 941 residents and employees. The population could increase the demand for police services but would not increase demand such that additional facilities would be required to service the site. Additionally, the project site is an urban area of the City where there are already existing residential buildings and other land uses that could require police services. As such, the service area of the WPD would not expand. Therefore, the project would not result in the need for new or physically altered police facilities and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The proposed project would include construction of 160 residential units and the addition of approximately 563 residents, based on the average reported household size 3.52 persons per household (DOF 2022). The school-aged residents of the proposed project would likely attend the nearest PVUSD schools, which are H.A. Hyde Elementary School, Cesar Chavez Middle School, and Watsonville High School. According to DOF population estimates, the population of Watsonville was approximately 50,669 as of January 2022 (DOF 2022). According to the U.S. Census Bureau's 2021 population estimates, approximately 30.6 percent of Watsonville's population comprised of school-aged children (18 years old or younger) (U.S. Census Bureau 2021). Applying this ratio of 30.6 percent school-aged children to the projected population increase due to the proposed project, the project would generate approximately 173 school-aged children.⁹ This additional student population would incrementally increase the service population and demand for PVUSD school services. In accordance with Senate Bill 50, the project applicant for the residential component of the Master Plan, when formally developed and proposed, would be required to pay development impact fees to PVUSD at the time of the building permit issuance. PVUSD would use collected funds towards new facilities to offset any impacts associated with new the development. Pursuant to California Government Code Section 65996, payment of these fees is deemed to fully mitigate cumulative CEQA impacts of new development on school facilities. Therefore, payment of state-mandated impact fees would reduce the project's potential impacts on school facilities, and expansion or construction of schools would result in impacts that are less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

As discussed in *Regulatory Setting* above, the Watsonville Parks and Recreation Facilities Master Plan establishes a goal of maintaining five acres of parkland per 1,000 residents. With 143 acres of parkland and a population of approximately 50,669, the City currently maintains approximately 2.82 acres of parkland per 1,000 residents, under the established goal. The proposed project would include construction of up to 160 residential units and would result in the addition of approximately 563 new residents. The increase in the City's population would result in a ratio of approximately 2.8 acres of parkland per 1,000 residents. However, the project would not result in substantial adverse physical effects or require the construction of new park facilities. Given the proximity of the H.A. Hyde Elementary School facilities, Crestview Park, and Flodberg Park, most project residents would likely walk to existing parks, and given the project would result in incremental population growth, there would not be demand for new parks. Therefore, the project would not result in substantial physical impacts resulting from new parks, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

⁹ 30.6 percent multiplied by 563 potential residents is approximately 173 residents under 18 years of age.

Because the project would not result in a significant increase in the City's or County's population, existing public facilities such libraries, recreation and community centers, public amenities, and other facilities would not need to be constructed or physically altered. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The City Parks and Community Services Department manages approximately 143 acres of parkland across 26 parks in Watsonville. Parkland includes community parks, neighborhood parks, pocket parks, and school properties. The nearest parks to the project site include the facilities at H.A. Hyde Elementary School 0.2-mile west of the site, Crestview Park 0.3-mile east of the site, and Flodberg Park 0.4-mile southwest of the site. The City also maintains several trails alongside Struve Slough; the nearest trail entrance to the project site is approximately 0.6 mile west of the project site (City of Watsonville 2021b).

Regulatory Setting

See *Regulatory Setting* of Section 15, *Public Services*, above.

Impacts Assessment

- 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?*

The project would not include on-site recreational facilities which might have an adverse physical effect on the environment. As discussed in Section 14, *Population and Housing*, the project would result in a population increase of approximately 378 employees and 563 residents. The estimated 378 employees includes the County employees who already report to the site for employment at the existing County health services buildings. Nonetheless, even when considering 378 employees as entirely new, the population growth resulting from implementation of the Master Plan would result in a nominal increase in parkland use within the City. As discussed above in Section 15, *Public Services*, the Watsonville Parks and Recreation Facilities Master Plan includes Goal 1-3, which aims

to provide five acres of parkland per 1,000 residents. The increase in the City's population would result in a ratio of approximately 2.8 acres of parkland per 1,000 residents. However, the project would not result in substantial adverse physical effects or require the construction of expanded park facilities within Watsonville. Given that the site is located near the center of Watsonville, residents of the project site would not generate substantial demand for County parks away from or outside of the City limits. Residents and occupants of the projects would result in nominal increased use of parks, resulting in no substantial deterioration. With the proximity of existing parks, the project would not result in substantial physical deterioration of existing parks and recreation facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

17 Transportation

	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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section is based on a Transportation Analysis prepared for the project by Hexagon Transportation Consultants, Inc., dated July 26, 2022. The Transportation Analysis, which is provided as Appendix C to this Initial Study, includes a CEQA transportation analysis conducted pursuant to the County of Santa Cruz Vehicle Miles Traveled (VMT) for CEQA Compliance guidelines. The Transportation Analysis methodology is summarized below; see Appendix C for detailed methodology.

Existing Setting

Existing Roadway Network

State Route 1, or SR 1, is a north-south freeway that extends through and beyond the Bay Area, connecting San Francisco to Los Angeles. In the project vicinity, SR 1 has two mixed-flow lanes in each direction. The posted speed limit is 65 miles per hour. SR 1 provides access to the project site via Main Street and SR 129. Local access to the site is provided on Green Valley Road, Main Street, Lake Avenue, Riverside Drive (SR 129), and Freedom Boulevard. These roadways are described below.

Green Valley Road is northeast-southwest four-lane major arterial that begins at Harkins Slough Road and extends north towards Amesti. Green Valley Road has a posted speed limit of 45 miles per hour between Main Street and Pennsylvania Drive, 40 miles per hour between Pennsylvania Drive and Freedom Boulevard, and 35 mile per hour northeast of Freedom Boulevard. Sidewalks or Class I shared use paths are present on both sides of the road.

Main Street is a northwest-southeast four-lane major arterial extending from SR 1 until it transitions to Porter Drive at the limits of the City of Watsonville. Main Street is designated as SR 152 between

SR 1 and Beach Street. Northwest of Freedom Boulevard, the posted speed limit is 40 miles per hour. Southeast of Freedom Boulevard, the posted speed limit is 25 miles per hour. Sidewalks are generally present on both sides of the street southeast of Green Valley Road. On-street parking is generally permitted on both sides of the street between of Ford Street and 2nd Street.

Lake Avenue is a northeast-southwest minor arterial that extends from Walker Street to Carlton Road. Lake Avenue has one lane in each direction southwest of Rodriguez Street and northeast of Lincoln Street. Between Rodriguez Street and Lincoln Street, Lake Avenue transitions to a one-way couplet with two lanes going southwest. Lake Avenue is designated as SR 152 northeast of Main Street. Lake Avenue has a posted speed limit of 45 miles per hour northeast of Wagner Avenue, 30 miles per hour between Wagner Avenue and Manor Avenue, and 25 miles per hour southwest of Manor Avenue. Sidewalks are generally present on both sides of the street. On-street parking is generally permitted on at least one side of the street southwest of Wagner Avenue.

Riverside Drive is a northeast-southwest major arterial that extends from SR 1 in Watsonville to US 101 in San Benito County. Riverside Drive has two mixed-flow lanes in each direction southwest of Union Street and one lane in each direction northeast of Union Street. Between Main Street and Blackburn Street, Riverside Drive has sidewalks on both sides of the street, and the posted speed limit is 25 miles per hour. On-street parking is generally permitted northeast of Union Street.

Freedom Boulevard is a northwest-southeast minor arterial that begins at Main Street and extends northwest towards Freedom. Freedom Boulevard has one lane in each direction south of Broadis Street and two lanes in each direction northwest of Broadis Street. Freedom Boulevard has a posted speed limit of 25 miles per hour southeast of Arthur Road and 30 miles per hour northwest of Arthur Road. Sidewalks are present on both sides of the street, and on-street parking is permitted along some segments.

Existing Bicycle and Pedestrian Facilities

Bicycle facilities are classified in three ways: off-street shared use paths separated from auto traffic (Class I), on-street striped bike lanes (Class II), on-street signed bike routes in which bicycles share the roadway with other vehicles (Class III). In the project vicinity, there are designated bike routes provided on Freedom Boulevard between Airport Boulevard and High Street in the northbound direction and on Miles Lane in the southbound direction. Although bicycle facilities in the project area are limited, many nearby local streets carry low traffic volume and are conducive to bicyclists.

Within the project vicinity, sidewalks and crosswalks are present along most sections of roadways. Pedestrian crosswalks and signal heads are present at the nearby signalized intersections. Crosswalks are also provided at many unsignalized intersections. It should be noted that while crosswalks are present, the striping at many intersections is fading. Sidewalks are provided along both sides of the streets in the study area and along the project frontages.

Existing Transit Service

Existing transit services near the project site are provided by the Santa Cruz Metropolitan Transit District (Santa Cruz METRO). There are four Santa Cruz METRO routes within a half mile of the project site, and the four bus routes have a bus stop along the project frontage of either Freedom Boulevard or Crestview Drive. The four routes near the project site include Route 69A, Route 71, Route WC, and Route 79. Each of the four transit routes have a reported headway of approximately 60 minutes (see Appendix C for more detail on transit routes).

Regulatory Setting

State

CALIFORNIA TRANSPORTATION DEVELOPMENT ACT

The Transportation Development Act, also known as the Mills-Alquist-Deddeh Act (SB 325), was enacted in 1971 to improve public transportation services and encourage regional transportation coordination. This law provides funding to be allocated to transit and non-transit related purposes that comply with regional transportation plans. The Transportation Development Act provides two funding sources: 1) the Local Transportation Fund, which is derived from a percentage of the general sales tax collected statewide; and 2) the State Transit Assistance Fund, which is derived from the statewide sales tax on diesel fuel.

Regional

SANTA CRUZ COUNTY REGIONAL TRANSPORTATION PLAN

The current Santa Cruz Regional Transportation Plan (SCCRTC 2022) is a comprehensive planning document that provides guidance for transportation policy and projects through the year 2045. The goals of the 2014 Santa Cruz Regional Transportation Plan include: 1) to improve people's access to jobs, schools, health care, and other regular needs that improve health, reduce pollution and retain money in the local economy; 2) to reduce transportation related fatalities and injuries for all transportation modes; and 3) to deliver access and safety improvements cost effectively, within available revenues, equitably and responsive to the needs of all users of the transportation system and beneficially for the natural environment. Policies include, but are not limited to, providing convenient, accessible, and reliable travel options; reduce per capita fuel consumption and GHG emissions; improve travel time reliability; improve multimodal network quality for walk and bicycle trips, improve safety, and ensure transportation services (and impacts) are equitably distributed to all segments of the population.

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Circulation Element of the County's General Plan, adopted in 1994 and revised in 2020, includes objectives and policies that address vehicle miles traveled, vehicle occupancy, the bikeway system, pedestrian travel, and roadway capacity/level of service (Santa Cruz County 1994). Key objectives and policies pertaining to transportation and circulation include:

Objective 3.1, Vehicle Miles. To limit the increase in Vehicle Miles Traveled (VMT) to achieve as a minimum, compliance with the current Air Quality Management Plan.

Policy 3.1.1, Land Use Patterns (Jobs/Housing Balance). Encourage concentrated commercial centers, mixed residential and commercial uses, and overall land use patterns which reduce urban sprawl and encourage the reduction of vehicle miles traveled per person.

Objective 3.2, Vehicle Occupancy. To increase the average number of persons per commute vehicle to 1.35 persons per vehicle while pursuing a goal of reducing automobile trips to a maximum of 60 percent of all trips through encouragement of alternative transportation by transit, bicycles, and walking.

Policy 3.2.2, Mode Split. Encourage large employers to provide incentives to carpoolers, bicyclists, pedestrians and transit riders such as priority parking, company car use, bicycle lockers, bus passes etc. in conjunction with the Trip Reduction ordinance.

Policy 3.2.3, Employee Carpool Program. Encourage large new developments to establish employee pool programs for car, van or bus pools.

Objective 3.8a, System Development. To develop a bikeway network maximizing the safety and convenience of users of all levels of experience within that system. The network should be primarily for commuter travel designed to increase the potential of combining bicycle travel with other forms of transportation and also include the opportunity for recreational use.

Objective 3.8b, Bicycle Use. To encourage bicycle travel as a major form of transportation in order to increase bicycle use to 20 percent of all work trips and to increase general bicycle trips to 5 percent of all trips by the year 2010.

Policy 3.8.4, User Convenience. Encourage the provision of bicycle racks, showers, lockers and other storage facilities at destinations, where practice and economically feasible, when reviewing discretionary permits for major activity centers and employer sites. These facilities should be provided at a level consistent with the County goal of 5% total bicycle travel.

Policy 3.8.5, Regional Continuity. Coordinate with other jurisdictions to adopt a system of bikeways that is functional throughout the County and region.

Objective 3.10, Pedestrian Travel. To encourage pedestrian travel as a viable means of transportation, by itself and in combination with other modes to achieve at least 7% of all trips through walking, by increasing and improving pedestrian facilities, particularly in urban areas and reducing the conflicts between pedestrians and other modes of travel.

Policy 3.10.4, Pedestrian Traffic. Require dedication and construction of walkways for through pedestrian traffic and internal pedestrian circulation in new developments where appropriate.

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville 2005 General Plan Land Use Element and Transportation and Circulation Element provide the following goals, policies, and implementation measures regarding transportation that are applicable to the project (City of Watsonville 1994):

Land Use Element

Measure 4.1.6: Traffic mitigations. The City shall place traffic impact mitigations on new development consistent with the policies of the Transportation and Circulation Element and City standards for access, parking, and roadway improvements.

Transportation and Circulation Element

Goal 10.1: Street and highway facilities. Plan and provide for a safe, efficient, and environmentally sensitive network of streets and highways for movement of people and goods.

Goal 10.2: Transit facilities and service. Promote the use of transit as an alternative to the automobile for all types of travel.

Goal 10.4: Bicycle circulation. Plan for and provide a safe, convenient network of bicycle facilities.

Goal 10.5: Pedestrian circulation. Recognize the importance of pedestrian travel, alone, or in combination with other travel modes, and to encourage walking.

Goal 10.7: Aesthetic considerations. Plan and provide for a circulation network that preserves and enhances scenic amenities.

Policy 10.A: Street and highway improvements. The City shall pursue a program of regularly scheduled maintenance and street improvements, accompanied by the planned extension of roadways to serve new development.

Policy 10.C: Level of Service. The City shall maintain a minimum Level of Service D (LOS D) on all arterial and collector streets serving the City except for those accepted to operate at less than an LOS D in the 1988-2005 Major Streets Master Plan as updated in 1992.

Policy 10.K: Bicycle facilities development. The City shall plan for and implement a comprehensive network of bicycle facilities in order to promote the bicycle as an alternative to the private automobile.

Policy 10.M: Bicycle support facilities. The City shall encourage bicycle facilities in new developments, as a commute alternative.

Policy 10.N: Pedestrian travel. The City shall plan for, and implement a comprehensive network of safe pedestrian facilities in order to promote pedestrian travel.

Policy 10.O: Walkway aesthetics and safety. Pedestrian walkways should be designed to promote walking by providing a safe and aesthetically pleasing path of travel.

Measure 10.O.3: Accessible pedestrian areas. All parking lots and pedestrian pathways shall be constructed in compliance with the City and/or State's accessibility standards.

Policy 10.P: Pedestrian access. Access for pedestrian travel shall be maintained where it already exists and provided where it does not, in order to prevent or eliminate barriers to pedestrian travel.

Policy 10.W: Transportation of hazardous materials. The City shall develop a process for ensuring that hazardous wastes being transported out of an through the city are carefully monitored.

Policy 10.Y: Emergency access. The City shall ensure that emergency or secondary access is provided for all new development in the city's service area.

CITY OF WATSONVILLE MUNICIPAL CODE

The City of Watsonville has adopted the California Fire Code with amendments, pursuant to Chapter 9 of WMC. The City's Fire Code requires adequate emergency vehicle access to development within the City, and plans for development would be reviewed by WFD prior to construction to ensure project plans are consistent with the fire code.

COUNTY OF SANTA CRUZ ACTIVE TRANSPORTATION PLAN

The Santa Cruz County Board of Supervisors adopted the County's Active Transportation Plan in May 2022. The plan intends to facilitate the development of bicycle and pedestrian networks that connect key destinations throughout the county. The County has set the goal of increasing walking and bicycling to eight percent of commute trips by 2030 and 15 percent of commute trips by 2040

for residents within the urban service boundary through implementation of projects and programs within the Active Transportation Plan (County of Santa Cruz 2022).

CITY OF WATSONVILLE TRAILS AND BICYCLE MASTER PLAN FOR THE WATSONVILLE SCENIC TRAILS NETWORK

The *City of Watsonville Trails and Bicycle Master Plan for the Watsonville Scenic Trails Network*, adopted November 2012, describes the existing and proposed bikeways and shared use trails throughout Watsonville that provide access to sloughs, wetlands, parks, schools, and commercial centers. In the immediate project vicinity, there are proposed bikeways along the entirety of Martinelli Street and Brewington Avenue. The City of Watsonville Trails and Bicycle Master Plan also proposes shared use trails on Alta Vista Avenue between Freedom Boulevard and Santa Clara Street, along the northeastern side of the upper Watsonville Slough between Main Street and Alta Vista Avenue, on Marin Street between the upper Watsonville Slough trail and Freedom Boulevard, and on Freedom Boulevard between Marin Street and Martinelli Street.

Impacts Assessment

- a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Development facilitated by the project would include adequate pedestrian, bicycle, and vehicle access and facilities. The project site is served by four existing Santa Cruz METRO transit routes, and there are bus stops along the project site frontage of Freedom Boulevard and Crestview Drive. The proposed project would not remove these routes or bus stops. The proposed project also does not include removal or modifications to the existing Class III bike route on Freedom Boulevard, and sidewalks on Freedom Boulevard, Crestview Drive, and Madison Street; therefore, the project would be consistent with County goals regarding pedestrian access to the transit system and would not remove existing bicycle and pedestrian sidewalks and routes.

The project would increase the number of vehicle trips on roadways around the project site because the Master Plan would generate additional employment on-site compared to existing conditions and designates an approximately four-acre portion of the site for residential development. Examples of roadways that would experience increased vehicle trips include Freedom Boulevard and Crestview Drive. A stated goal of the Master Plan is to provide active transportation infrastructure, which could encourage more bicycle travel on these same roadways. The increase vehicle trips on these roadways combined with increased bicycle use could cause safety issues. Likewise, the increased vehicle trips on these roadways could create safety issues with existing bike travel on the roadways, particularly roadways with shared Class III bike routes, such as Freedom Boulevard.

The City of Watsonville has several projects in progress that would provide infrastructural enhancements to Freedom Boulevard, many of which are intended to enhance to experience of pedestrians, cyclists, and other non-motorized uses of the street. For example, the City's Freedom Boulevard Road Reconstruction Project would add Class II bike lanes to the segment of Freedom Boulevard between Green Valley Road and Alta Vista Avenue. The intersection of Freedom Boulevard and Alta Vista Avenue is approximately 200 feet north of the project site. Therefore, the City has projects underway that would provide potentially safer bicycle travel on Freedom Boulevard in proximity to the project site. Bicycle travel would be potentially safer because the Class

II bike route would provide a dedicated bike lane on Freedom Boulevard offset from the vehicle travel lanes.

Similarly, Hyde Elementary School is located on Alta Vista Avenue, and schoolchildren could utilize bicycles to reach the project site for after-school events or programs. According to the *City of Watsonville Trails and Bicycle Master Plan for the Watsonville Scenic Trails Network*, a proposed greenway trail would connect the school to Main Street. The *City of Watsonville Trails and Bicycle Master Plan for the Watsonville Scenic Trails Network*, a bike route is planned on Main Street connecting to the west side of Freedom Boulevard, where children could then utilize the existing crosswalk to access the east side of Freedom Boulevard and the project site. These planned bike routes would reduce the potential safety issues for bicycle access between Hyde Elementary School and the project site that could result from increased vehicle trips on nearby roads. The provision of these bicycle routes would help the City achieve its goals outlined in its Vision Zero Action Plan 2021 (City of Watsonville 2021c).

As described above in the *Regulatory Setting* discussion, Objective 3.8b of the County's General Plan calls for increased bicycle travel in the County. Policy 3.8.4 of the County's General Plan encourages the provision of bicycle facilities, such as bicycle racks and lockers, where feasible when reviewing discretionary permits for major activity centers and employer sites. The proposed project does not require a discretionary permit because it consists of the potential adoption of a Master Plan, which does not involve permitting (see Section 7, *Project Related Approvals, Permits, and Agreements*). While the Master Plan does envision more active transportation facilities, it does not specifically identify the types of facilities described in Policy 3.8.4. Accordingly, the Master Plan could conflict with General Plan Policy 3.8.4. Accordingly, impacts would be potentially significant, and mitigation is required. With implementation of mitigation measure TRA-1, impacts would be reduced to less than significant.

Mitigation Measures

TRA-1 On-Site Bicycle Amenities

As County buildings envisioned in the Master Plan are designed, the site plans shall incorporate bicycle facilities, including bicycle racks, bicycle lockers, and showers for staff members who bicycle to work.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The City of Watsonville has not yet adopted thresholds or guidelines related to VMT. Thus, the VMT thresholds used for this project are based on the Santa Cruz County VMT guidelines. The County of Santa Cruz adopted VMT Implementation Guidelines in July 2020 (updated in May 2021). Santa Cruz County VMT Implementation Guidelines specify procedures for determining project impacts on VMT based on the project description, characteristics, and location.

The VMT methodology in the County's Implementation Guidelines also includes screening criteria that are used to identify types, characteristics, and locations of projects that would not exceed the VMT thresholds of significance. If a project or a component of a mixed-use project meets the screening criteria, it is then presumed that the project or the component would result in a less than significant VMT impact, and a detailed VMT analysis is not required. The Implementation Guidelines provide the following screening criteria

- Small projects: project trip generation less than 100 net new trips per day.
- Projects near high quality transit: located within ½ mile of an existing major transit stop (two or more bus lines which maintain a service interval frequency of 15 minutes or less during peak periods).
- Local-serving retail: no single store on-site exceeds 50,000 square feet.
- Affordable housing: project provides a high percentage of affordable housing as determined by Santa Cruz County.
- Local essential service: day care center, public K-12 school, police or fire facility, local serving medical/dental office building, or government office.
- Map-based screening: area of development is under threshold as shown on Santa Cruz County screening map.
- Redevelopment projects: project replaces an existing VMT-generating land use and does not result in a net overall increase in VMT.

According to the Implementation Guidelines, projects with multiple distinct land uses are required to be analyzed separately unless they are determined to be insignificant to the total VMT. The proposed Master Plan envisions a new building or buildings for County health services and reserves approximately 4 acres of the project site for residential development.

The health services component of the proposed Master Plan would meet the local essential service screening criteria and therefore would result in less than significant VMT impacts. Additionally, the project site is currently occupied by these services in older and smaller buildings. The primary goal or objective of the proposed Master Plan is to create a modern, user-friendly community hub for health and wellness that is easily accessible to South County residents. Upon completion, the Project would provide a platform for the expansion of County health services into South County, reducing the need to travel north for critical services. Eliminating the need to travel north would reduce VMT. The approximately 5,000 square feet of community-serving uses, such as a limited café or food service operation, envisioned in the proposed Master Plan service center would be less than 50,000 square feet and would serve the local community. Therefore, the project meets the local-serving retail screening criteria. Accordingly, the local-serving retail component of the proposed project would result in less than significant VMT impacts.

Approximately four acres of the project site would be designated for residential development. Regardless of the number of residential buildings, the project site would contain up to 160 residential units and up to 75 percent of the units would be deed-restricted affordable housing. Based on the Santa Cruz County Residential Screening Map the project site is in a zone with VMT that is at or below the County threshold. Therefore, the residential component of the project would meet the map-based screening criteria. For this reason, the VMT impacts of the residential component of the project would be less than significant. The County's Residential Screening Map is included in the Transportation Analysis, which is provided as Appendix C to this IS-MND.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The project would utilize existing vehicle driveways on Freedom Boulevard, Crestview Drive, and Madison Street. The project would not introduce sharp curves, dangerous intersections, or other hazards due to design features. Further, the project would involve development of County health services building(s) and residential building(s), which would involve typical passenger vehicle traffic and would not introduce incompatible uses on the project site. The proposed project also envisions

parking on-site, either in a garage or as surface parking or a combination of both, but regardless, these spaces would be outside of traffic or travel lanes. Therefore, impacts related to hazards or incompatible uses would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

The design of the project is required to comply with the County's standards for emergency vehicle access (including providing adequate points of access, vertical clearance, and turning radius). Emergency vehicle access would be provided via existing vehicle driveways on Freedom Boulevard, Crestview Drive, and Madison Street. Should construction of development facilitated by the project require a lane closure of any of the surrounding roadways, clear signage (e.g., closure and detour signs) would be provided to ensure vehicles, pedestrians and bicyclists are able to adequately reach their intended destinations safely. Consistent with County standard practice, the project would be required to submit a construction management plan for county approval that addresses the construction schedule, street closures and/or detours, construction staging areas and parking, and the planned truck routes. In operation, the applicant would be required to provide the County with a detailed plan demonstrating that each floor of the proposed residences would be accessible by a fire aerial apparatus, fire hoses, and other emergency vehicles from surrounding roadways. The project plans would also be subject to review by WFD to ensure that adequate emergency access would be available prior to issuance of building permits. Therefore, the project would not result in inadequate emergency access and the impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:</p>				
<p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b. 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Rincon conducted a search of the California Historical Resources Information System (CHRIS) of the Northwest Information Center located at Sonoma State University on November 3, 2021. The records search was conducted for the project site and a 0.5-mile radius of the site. The search did not indicate known cultural resources within the project site. Additionally, Rincon completed a search of the Native American Heritage Commission (NAHC) Sacred Lands File for the project. The NAHC Sacred Lands File search was returned with positive findings for cultural resources within the project site. On December 8, 2021, Rincon sent letters to eight Native American contacts in the area to request information on potential cultural resources in the project vicinity that may be impacted by project development.

Responses were received from Chairman Patrick Orozco of the Costanoan Ohlone Rumsen-Mutsen Tribe and Kanyon Sayers-Roods of the Indian Canyon Mutsun Band of Costanoan. Both representatives indicated that the project site and surrounding areas are considered sensitive due to their proximity to Corralitos Creek and other natural resources. Rincon’s complete outreach effort and full cultural resources technical study is on file at the County Department of Community Development & Infrastructure offices located at 701 Ocean Street, 4th Floor, Santa Cruz.

Assembly Bill (AB) 52, detailed in the *Regulatory Setting* below, requires lead agencies to conduct formal consultations with California Native American tribes during the CEQA process to identify tribal cultural resources that may be subject to significant impacts by a project. At the time of preparation of this Initial Study, no California Native American tribes traditionally and culturally affiliated with the Santa Cruz County region have formally requested consultation with the County of Santa Cruz regarding Tribal Cultural Resources pursuant to Public Resources Code section 21080.3.1. The Costanoan Ohlone Rumsen-Mutsen Tribe and the Indian Canyon Mutsun Band of Costanoan replied during efforts to investigate potential cultural resources on site. Mr. Orozco recommended Native American monitoring during ground disturbing activities, and Ms. Sayers-Roods requested to be involved in the project moving forward and stated that more information was preferred before making a recommendation of Native American or archaeological monitoring.

Regulatory Setting

Federal

Refer to Section 5, *Cultural Resources*, for the federal regulatory setting pertaining to Tribal Cultural Resources.

State

Refer to Section 5, *Cultural Resources*, for a description of the California Register of Historic Places.

Assembly Bill 52

Assembly Bill 52 (AB 52) expanded CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. 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 Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 establishes a formal consultation process for California Tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Local

Refer to Section 5, *Cultural Resources*, for the local regulatory setting.

Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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 Section 5024.1?*

The NAHC Sacred Lands File search was returned with positive findings for cultural resources within the project site, and representatives from consulted tribes indicated that the project site may be sensitive due to its proximity to Corralitos Creek. Accordingly, there is potential to uncover buried archaeological and tribal cultural resources during ground disturbing activities, such as the excavation and grading that would be required for project implementation. Should project construction activities encounter and damage or destroy a tribal cultural resource or resources, impacts would be potentially significant. Implementation of the Mitigation Measures CUL-1 and CUL-2, discussed in Section 5, *Cultural Resources*, would ensure that potential impacts to tribal cultural resources would be less than significant.

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19 Utilities and Service Systems

	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 telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Setting

Water Supply and Distribution

The project site is located within the service area of the Watsonville Public Works and Utilities Department. The Department currently provides water to about 15,980 connections that serve approximately 66,000 customers within a service area that extends beyond the Watsonville City limits into Santa Cruz County.

Although the City relies primarily on groundwater sources, during years of normal rainfall, the City utilizes a combination of surface water and groundwater supply sources. The City maintains pre-1914 appropriative rights to Corralitos and Browns Creeks. The surface diversions are piped to the

Corralitos Filter Plant and are treated via slow sand filtration and disinfection. The Corralitos Filter Plant averages approximately 900 AFY, though it has a capacity of 2,400 AFY. Its operation is limited by the amount of surface water available in the Corralitos and Browns Creeks. During the rainy season, the plant is usually shut down due to the high turbidity of the intake water which cannot be treated at the plant. Therefore, the City's surface water supply reliability is susceptible to variations of the influent water quality. Approximately 10 percent of the City's total water supply is from surface water sources (City of Watsonville 2020).

Groundwater from the Pajaro Valley Groundwater Subbasin is the City's primary water supply source. There are currently 14 groundwater wells in the City with a combined total capacity of 21,600 AFY; however, pumps usually do not run at maximum capacity. Therefore, an approximate average of 7,000 AFY is utilized as a reliable operating capacity for groundwater supplies. All groundwater is treated at each well site and meets or exceeds state and federal drinking water standards.

Wastewater Treatment

The City of Watsonville provides wastewater service to the Watsonville, Pajaro, Freedom, and Salsipuedes sanitary districts, a 21-square-mile service area. The City maintains more than 170 miles of collection pipelines and numerous pump stations to ensure that wastewater flows without interruption to the Watsonville Wastewater Treatment Facility (WWTF), located at 401 Panabaker Lane adjacent to the Pajaro River. In 1998, the City of Watsonville completed substantial improvements to the wastewater treatment facility that enabled the plant to process 12.1 million gallons of effluent at a secondary level of treatment. While the WWTF has the capacity to treat 12.1 million gallons per day, this facility currently treats an average of 6.7 million gallons of wastewater from residential, commercial, and industrial sources. The wastewater is treated to the advanced secondary treatment level for ocean discharge and advanced tertiary treatment for direct food crop irrigation. The wastewater undergoes extensive monitoring and testing to ensure compliance with all regulatory pollution prevention laws (City of Watsonville 2020).

The City of Watsonville financed construction of a water recycling plant which produces irrigation water for the Pajaro Valley Water Management Agency's coastal distribution system. The recycling plant is an element of the Pajaro Valley Water Management Agency's Basin Management Plan that will recycle an amount equal to 50 percent of the City's water production and deliver up to 6,000 AFY of blended recycled water to farms located in the coastal areas. The water recycling plant is located adjacent to the WWTF and processes a portion of the secondary treated effluent, providing additional treatment at the tertiary level. The tertiary treated water is blended with groundwater to increase the supply when the irrigation demand is high and to provide an uninterrupted supply of irrigation water if the recycled water plant stops producing for maintenance work, for example (City of Watsonville 2020).

Stormwater Drainage

The City of Watsonville is responsible for construction and maintenance of all public stormwater facilities within its limits. Stormwater drainage infrastructure within the City's Urban Limit Line consists of natural streams, sloughs, subsurface stormwater drainage pipelines, and pump stations. Most of the City of Watsonville drains to Watsonville Slough and Struve Slough, but the northern and eastern areas of the city drain to Salsipuedes Channel. The project site drains to the Watsonville Slough, located approximately 600 feet southwest of the site.

Solid Waste Management

The City's Public Works and Utilities, Solid Waste Division, handles solid waste management, including waste disposal and curbside recycling. Solid waste is currently taken to the City landfill, a Class III landfill located four miles outside of the City Limits on San Andreas Road. The City of Watsonville Landfill has a permitted capacity of 2,437,203 cubic yards, and currently has a remaining capacity of 1,417,561 cubic yards. The maximum daily throughput of the City's landfill is 275 tons per day (California Department of Resources Recycling and Recovery [CalRecycle] 2019a).

Although solid waste is currently taken to the City landfill, the City is working on closure of the landfill. Upon its closure, residential and household solid waste will be taken to the Monterey Peninsula Landfill, located at 14201 Del Monte Boulevard, in the City of Marina, Monterey County. Non-hazardous medical and health services waste would also be taken to the Monterey Peninsula. The maximum permitted capacity of the Monterey Peninsula Landfill is 49.7 million cubic yards, and a remaining capacity of approximately 48.6 million cubic yards. The maximum daily throughput of the Monterey Peninsula Landfill is 3,500 tons per day (CalRecycle 2019b).

Electricity, Gas, and Telecommunications

Pacific Gas and Electric Company (PG&E) transmits and delivers electricity and natural gas to residents and businesses in the City of Watsonville, including the project site. Watsonville is also served by Central Coast Community Energy, a community choice energy agency established by local communities which transmits a greater percentage of renewable energy via PG&E transmission lines.

AT&T provides telephone service to the City. The California Public Utilities Commission regulates telephone service. AT&T is compensated for its operations, maintenance, and capital improvement costs by connection and user fees, which it collects from all new development.

Charter Communications provides cable television service to the City. This company is privately owned and operated and recovers its operations, maintenance, and capital improvement costs by connection and user fees.

Regulatory Setting

State

CALIFORNIA GREEN BUILDING STANDARDS CODE

CALGreen establishes mandatory green building requirements and provides guidelines for all buildings in California. The code includes specific regulations pertaining to:

- Planning and design
- Energy efficiency
- Water efficiency and conservation
- Material conservation and resource efficiency
- Indoor environmental quality
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition ("C&D") debris, or meeting the local construction and demolition waste management ordinance, whichever is more stringent (see San José-specific CALGreen building code requirements in the local regulatory framework section below); and
- Providing readily accessible areas for recycling by occupants.

The guidelines provide measures for new construction projects to achieve green building performance levels, including reducing indoor water use by 20 percent, reducing wastewater by 20 percent, recycling and salvaging 50 percent of non-hazardous construction debris and providing readily accessible areas for recycle.

ASSEMBLY BILL 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

ASSEMBLY BILL 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

SENATE BILL 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Santa Cruz County General Plan and Local Coastal Program Parks, Recreation, and Public Services Element includes the following objectives and policies related to water, wastewater, electricity, solid waste, and other utilities and service systems (County of Santa Cruz 1994):

Objective 7.18b. Water Supply Limitations. To ensure that the level of development permitted is supportable within the limits of the County's available water supplies and within the constraints of community-wide goals for environmental quality.

Objective 7.18c. Water Conservation. To maximize the County's water conservation potential through a coordinated program with water purveyors and water management agencies involving public education, financial incentives to conserve, voluntary and mandatory conservation measures, retrofit programs, run-off management and water waste regulations and enforcement.

Policy 7.18.2. Written Commitments Confirming Water Service Required for Permits.

Concurrent with project application, require a written commitment from the water purveyor that verifies the capability of the system to serve the proposed development. Projects shall not be approved in areas that do not have a proven, adequate water supply. A written commitment is a letter from the purveyor guaranteeing that the required level of service for the project will be available prior to the issuance of building permits, or in the case of a subdivision, prior to filing the Final Map or Parcel Map. The County decision making body shall not approve any

development project unless it determines that such project has adequate water supply available.

Policy 7.18.3. Impacts of New Development on Water Purveyors. Review all new development proposals to assess impacts on municipal water systems, County water districts, or small water systems. Require that either adequate service is available or that the proposed development provide for mitigation of its impacts as a condition of project approval.

Policy 7.18.4. Improvement of Water Systems. Support water system improvement programs for storage, treatment and distribution facilities to meet necessary water supply and fire suppression requirements.

Policy 7.18.5. Groundwater Management. Promote water management in the Pajaro Valley and Santa Margarita groundwater basins and the Soquel-Aptos area to protect the long-term security of water supplies and to safeguard groundwater quality and maintain stream baseflows.

Policy 7.18.6. Water Conservation Requirements. Utilize the best available methods for water conservation in new developments. Work with all water purveyors to implement demand management programs and water conservation measures. In areas where shortage or groundwater overdraft has been substantiated by the water purveyor, require water conservation measures for new and existing uses. Require the use of water-saving devices such as ultra-low-flow fixtures and native drought-resistant planting in new development projects to promote ongoing water conservation.

Policy 7.18.7. Water Reuse. Encourage the reuse and recycling of water where feasible and where reuse will not have a negative impact on public health or the environment, including the use of greywater systems, and recycling of irrigation water for irrigation purposes as acceptable to Environmental Health Services, State Department of Health Services and Regional Water Quality Control Board.

Objective 7.19. Sanitation Facilities Within the Urban Services Line. To provide necessary and adequate sanitation services to areas of urban development within the Urban Services Line based on a trunk-line sewage collection, treatment and disposal system.

Policy 7.19.1. Sewer Service to New Development. Concurrent with project application, require a written commitment from the service district. A written commitment is a letter, with appropriate conditions, from the service district guaranteeing that the required level of service for the project will be available prior to issuance of building permits, or in the case of a subdivision, prior to filing the Final Map or Parcel Map. The County decision making body shall not approve any development project unless it determines that such project has adequate sewage treatment plant capacity.

Policy 7.19.2. Development Linkage to Downstream Sewer System Improvements. Require new development to pay its full fair share of downstream sewer system improvements needed. In areas where cumulative sewer capacity is a problem, as indicated by the Department of Public Works, require all development to make required downstream improvements or be appropriately limited until downstream improvements are made.

Policy 7.19.3. Sizing Sewer Facilities. Require developers, including public agencies, to locate and size new collection systems to best serve all areas inside the Urban Services Line.

Policy 7.22.3. Use of Low Energy Gravity Transfer Systems. Where feasible, encourage sewage disposal systems in new development to utilize natural gravity flows to the maximum extent, reducing the energy costs associated with pumping.

Objective 7.24a. Integrated Waste Management System. To conserve natural resources and energy and extend the lifespan of local landfills by instituting an integrated waste management system that consists of source reduction, recycling, composting, selective transformation and landfill disposal and that promotes waste reduction and maximizes the recovery of materials from the waste stream.

Objective 7.24c. Materials Recovery and Source Reduction. To meet, and exceed where feasible, the 25 percent (by 1995) and the 50 percent (by 2000) landfill diversion mandates established by the State Integrated Waste Management Act of 1989 through source reduction, recycling and composting.

Policy 7.24.6. Recycling Opportunities and Assistance for Businesses. Provide recycling opportunities for all businesses and other non-residential uses of land in the unincorporated County through the establishment of collection systems and technical assistance to address on-site needs and conditions.

Policy 7.24.9. Storage Requirement for Recyclable Materials. Require all projects, except single family dwellings, to provide sufficient and accessible space for the storage and collection of recyclable materials separate from, and in addition to, space for refuse storage and collection. Encourage owners of existing buildings to provide such space, where feasible.

Objective 7.25a. Refuse Collection. To protect public health and safety through the provision of efficient and economically reasonable collection services for as many sources of waste generation as practical.

Policy 7.25.1. Requiring Space for Refuse Collection. Require all new projects, except single family dwellings, to provide sufficient and accessible space for the storage and collection of refuse separate from, and in addition to, space for recyclable materials collection.

Policy 7.25.2. Recyclable vs. Refuse Contracts. Ensure that solid waste collection contracts maintain a distinction between recyclable materials and refuse.

Objective 7.26. Electrical Distribution System. To improve the reliability and aesthetic quality of the electrical energy distribution system in order to promote public health and safety, environmental protection, and resource conservation in the operation of existing or new energy production or distribution systems.

Policy 7.26.1. Undergrounding Lines. Require all new power line distribution systems and all services to new development to be placed underground.

SANTA CRUZ COUNTY CODE

Chapter 7.20, Article VII of Santa Cruz County Code outlines types of covered materials that must be diverted from landfills. Solid waste generators, or all property owners including but not limited to owners of commercial businesses and residents of single-family and multi-family structures, must participate in a program to divert covered materials. Covered materials include recyclable and organic materials, as well as construction and demolition debris.

CITY OF WATSONVILLE GENERAL PLAN

The City of Watsonville General Plan Public Facilities and Services Element contains goals, policies, and implementation measures related to water, wastewater, and solid waste. The following goals, policies, and measures are applicable to the project (City of Watsonville 1994).

Goal 11.1: Service availability. Maintain or increase the current availability of public services and facilities consistent with projected population growth in the City limits and Sphere of Influence and according to the fiscal resources of the City.

Goal 11.2: Public services. Assure new development can be served by adequate public services and facilities.

Goal 11.3: Water supply. Construct and maintain a water system and institute water management policy that will provide a sufficient quantity of appropriate-quality water to meet the needs of the existing and planned community.

Goal 11.4: Wastewater management. Continue the safe and efficient collection, treatment, and disposal of domestic and industrial wastewater to meet the needs of the service population, protect the environment, and comply with all applicable regulations.

Measure 11.C.5: Site Improvements. New projects within the urbanized area shall be required to complete on-site water connection improvements consistent with water quality standards of the Water Department.

Measure 11.F.4: Fees. The City shall assess sanitation impact fees on new development in proportion to the amount of wastewater they are anticipated to generate and the cost of extending services unless alternative funding resources are available.

Impacts Assessment

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The project would be served by the existing water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications infrastructure within the project site, with new service connections provided for the new buildings.

Water and Wastewater

The project would result in an increase in water use and wastewater generation based on the new County health services building(s) and the 160-unit residential building(s). In the City's 2020 Urban Water Management Plan, it was determined that the City's 2020 water consumption was 87 gallons per capita per day (City of Watsonville 2020). As described in Section 14, *Population and Housing*, the project would facilitate the addition of approximately 378 employees associated with the County health services building(s) and 563 residents, associated with the residential building(s), or 941 people total. Based on these data, in a maximum growth scenario where the project increases the City's population by 941 people, the project would generate an estimated 81,867 gallons per day, or approximately 91.7 acre-feet per year (AFY), of new water demand. This is a conservative estimate because it includes existing on-site employees and associated water demand.

Table 22 details the anticipated supply and demand of water in Watsonville in normal, single-dry, and multiple-dry years through 2045 in acre-feet per year.

Table 22 Watsonville Water Supply and Demand Through 2045 (AFY)

Supply and Demand		2025	2030	2035	2040	2045
<i>Normal Year</i>						
Supply Total		21,900	21,900	21,900	21,900	21,900
Demand Total		7,827	8,023	8,224	8,375	8,504
Difference		14,073	13,877	13,676	13,525	13,396
<i>Single Dry Year</i>						
Supply Total		21,900	21,900	21,900	21,900	21,900
Demand Total		8,688	8,906	9,128	9,296	9,440
Difference		13,212	12,994	12,772	12,604	12,460
<i>Multiple Dry Years</i>						
	Supply Total	21,900	21,900	21,900	21,900	21,900
First Year	Demand Total	8,140	8,344	8,553	8,710	8,845
	Difference	13,760	13,556	13,347	13,190	13,055
	Supply Total	21,000	21,000	21,000	21,000	21,000
Second Year	Demand Total	8,688	8,906	9,128	9,296	9,440
	Difference	13,212	12,994	12,772	12,604	12,460
	Supply Total	21,000	21,000	21,000	21,000	21,000
Third Year	Demand Total	7,827	8,023	8,224	8,375	8,504
	Difference	14,073	13,877	13,676	13,525	13,396
	Supply Total	21,000	21,000	21,000	21,000	21,000
Fourth Year	Demand Total	7,201	7,381	7,566	7,705	7,824
	Difference	14,699	14,519	14,334	14,195	14,076
	Supply Total	21,000	21,000	21,000	21,000	21,000
Fifth Year	Demand Total	6,653	6,820	6,990	7,118	7,229
	Difference	15,247	15,080	14,910	14,782	14,671

Source: City of Watsonville 2020

Note: Water supply and demand totals are in acre feet per year

As shown in Table 22, demand for water would not exceed supply in normal, single-dry, or multiple-dry year hydrologic conditions. The additional project water demand of 91.7 AFY represents less

than one percent of the City's projected supply. Further, this analysis considers a maximum growth scenario, and does not account for the water demand of the existing uses at the project site, which would be replaced with the project. Therefore, sufficient water supplies would be available for the project during normal, dry, and multiple-dry years, and impacts would be less than significant.

Conservatively assuming that wastewater flow rates from the project would be 95 percent of the estimated water demand, the project would generate approximately 77,773 gallons of wastewater per day. As stated above in *Existing Setting*, the WWTF has the capacity to treat 12.1 million gallons per day. The additional wastewater generated by development facilitated by the project would represent less than one percent of the WWTF's remaining wastewater treatment capacity. Therefore, the existing WWTF would be able to accommodate increased wastewater flows associated with the project and the project would not require the construction of new or expansion of existing wastewater treatment facilities. Project impacts to wastewater treatment facilities would be less than significant.

Stormwater Drainage

As described in section 10, *Hydrology and Water Quality*, while the project would increase the impervious surface areas on the project site, the project would also include new stormwater treatment and drainage features pursuant to NPDES stormwater management requirements and runoff and pollution control requirements established by Santa Cruz County Code Chapter 7.79. The project would not contribute stormwater runoff which would exceed the capacity of existing or planned stormwater drainage system. Therefore, the project's impact on the capacity of stormwater drainage systems would be less than significant.

Electricity, Natural Gas, and Telecommunications

Development facilitated by the project would increase demand for electricity, natural gas, and telecommunication facilities. Because the project site is already developed and development facilitated by the project would not substantially increase demand for electricity, natural gas, and telecommunications facilities, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

As stated above, the project would wastewater, but the project's wastewater generation would comprise a negligible portion of the WWTF's existing capacity for treatment. Further, in accordance with County of Santa Cruz General Plan Policy 7.19.1, the County shall obtain written commitment from the City of Watsonville that adequate wastewater facilities exist prior to issuance of building permits. Therefore, the project would have a less than significant impact related to wastewater treatment capacity.

LESS THAN SIGNIFICANT IMPACT

- d. *Would the project 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. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

CalRecycle estimates that services such as health services offices generate approximately 3.12 pounds of solid waste per 100 square feet per day, and that multi-family residential uses generate approximately 8.6 pounds of solid waste per day. The project would facilitate the development of up to 85,000 square feet of County health services facilities and up to 160 residential units. These uses would result in the generation of approximately 2,652 pounds of solid waste per day associated with the County health services facilities¹⁰ and approximately 1,376 pounds of solid waste per day associated with the residential units.¹¹ Combined, development facilitated by the project would generate approximately 4,028 pounds of solid waste per day, or 735 tons per year. This is a conservative estimate that does not account for solid waste generated on-site currently, which would be eliminated and replaced by the proposed project.

As described above in *Existing Setting*, solid waste in Watsonville is disposed of at the City of Watsonville Landfill and will eventually be disposed of at the Monterey Peninsula Landfill. Table 23 below compares the solid waste estimated to be generated by development facilitated by the project and the capacities of the solid waste facilities that would serve the project.

Table 23 Project Generated Solid Waste and Facility Capacity

Landfill Facility	Facility Daily Permitted Throughput (tons per day)	Project Percent of Daily Throughput	Permitted Capacity of Facility (cubic yards)	Project Percent of Remaining Capacity ¹
City of Watsonville Landfill	275	0.7%	2,437,203	1.1%
Monterey Peninsula Landfill	3,500	0.05%	49,700,000	<0.01%

Source: CalRecycle 2019a, 2019b

1: the average density of solid waste is approximately 527 pounds per cubic yard (Palanivel and Sulaiman 2014).

As shown in Table 23, the project would generate a negligible percentage of the landfills’ permitted capacities and daily throughputs. Therefore, the project would have a less than significant impact on landfill capacity.

The project would be required to comply with County and State plans and policies to reduce solid waste generation, including a requirement to divert at least 50 percent of solid waste and recyclables, as required by Assembly Bill 939 and Santa Cruz County Code. The project’s incremental increase in solid waste would not adversely affect solid waste facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

¹⁰ 3.12 pounds of solid waste per day multiplied by 850 hundred square feet is approximately 2,652 pounds per day.

¹¹ 8.6 pounds of solid waste per day multiplied by 160 residential units is approximately 1,376 pounds per day.

20 Wildfire

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The California Department of Forestry and Fire Protection (CAL FIRE) maps areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors, pursuant to Public Resources Code 4201-4204 and Government Code 51175-51189. These areas are referred to as Fire Hazard Severity Zones (FHSZs) and are identified for areas where the state has financial responsibility for wildland fire protection (i.e., state responsibility areas, or SRAs), and areas where local governments have financial responsibility for wildland fire protection (i.e., local responsibility areas, or LRAs). The project site is located within a LRA and is not located near a SRA or a very high FHSZ (CAL FIRE 2007). Additionally, the project site is located within an urbanized area of the City of Watsonville and is surrounded by other developed land uses or roads on all sides. Given the surrounding land uses, there are insufficient fuels for a wildland fire.

Regulatory Setting

Local

COUNTY OF SANTA CRUZ GENERAL PLAN AND LOCAL COASTAL PROGRAM

The Santa Cruz General Plan and Local Coastal program Safety Element contains the following applicable objectives and policies related to wildfire (County of Santa Cruz 1994):

Objective 6.5: Fire Hazards. To protect the public from the hazards of fire through citizen awareness, mitigating the risks of fire, responsible fire protection planning and built-in systems for fire detection and suppression [*sic*]

Policy 6.5.1: Access Standards. Require all new structures, including additions of more than 500 square feet, to single-family dwellings on existing parcels of record, to provide an adequate road for fire protection in conformance with the following standards:

- Access roads shall be a minimum of 18 feet wide for all access roads or driveways serving more than two habitable structures, and 12 feet for an access road or driveway serving two or fewer habitable structures. Where it is environmentally inadvisable to meet these criteria (due to excessive grading, tree removal or other environmental impacts), a 12-foot wide all-weather surface access road with 12-footwide by 35-foot long turnouts located approximately every 500 feet may be provided with the approval of the Fire Chief. Exceptions: Title 19 of the California Administrative Code, requires that access roads from every state governed building to a public street shall be all-weather hard-surface (suitable for use by fire apparatus) roadway not less than 20 feet in width. Such roadway shall be unobstructed and maintained only as access to the public street.
- Obstruction of the road width, as required above, including the parking of vehicles, shall be prohibited, as required in the Uniform Fire Code.
- The access road surface shall be "all weather", which means a minimum of six inches of compacted aggregate base rock, Class 2 or equivalent, certified by a licensed engineer to 95 percent compaction and shall be maintained. Where the grade of the access road exceeds 15 percent, the base rock shall be overlain by 2 inches of asphaltic concrete, Type B or equivalent, and shall be maintained.
- The maximum grade of the access road shall not exceed 20 percent, with grades greater than 15 percent not permitted for distances of more than 200 feet at a time.
- The access road shall have a vertical clearance of 14 feet for its entire width and length, including turnouts.
- Gates shall be a minimum of 2 feet wider than the access road/driveway they serve. Overhead gate structures shall have a minimum of 15 feet vertical clearance.
- An access road or driveway shall not end farther than 150 feet from any portion of a structure.
- A turn-around area which meets the requirements of the fire department shall be provided for access roads and driveways in excess of 150 feet in length.
- No roadway shall have an inside turning radius of less than 50 feet. Roadways with a radius curvature of 50 to 100 feet shall require an additional 4 feet of road width. Roadways with radius curvatures of 100 to 200 feet shall require an additional 2 feet of road width.

- Drainage details for the road or driveway shall conform to current engineering practices, including erosion control measures.
- Bridges shall be as wide as the road being serviced, meet a minimum load bearing capacity of 25 tons, and have guard rails. Guard rails shall not reduce the required minimum road width. Width requirements may be modified only with written approval from the Fire Chief. Bridge capacity shall be posted and shall be certified every five years by a licensed engineer. For bridges served by 12 foot access roads, approved turnouts shall be provided at each bridge approach.
- All private access roads, driveways, turn arounds and bridges are the responsibility of the owner(s) of record and shall be maintained to ensure the fire department safe and expedient passage at all times.
- To ensure maintenance of private access roads, driveways, turnarounds and bridges, the owner(s) of parcels where new development is proposed shall participate in an existing road maintenance group. For those without existing maintenance agreements, the formation of such an agreement shall be required.
- All access road and bridge improvements required under this section shall be made prior to permit approval, or as a condition of permit approval.
- Access for any new dwelling unit or other structure used for human occupancy, including a single-family dwelling on an existing parcel of record, shall be in the duly recorded form of a deeded access or an access recognized by court order. Diagrammatic representations of access standards are available at the Santa Cruz County Planning Department and local fire agencies.

Policy 6.5.7: Certification of Adequate Fire Protection Prior to Permit Approval. Require all land divisions, multi-unit residential complexes, commercial and industrial complexes, public facilities and critical utilities to obtain certification from the appropriate fire protection agency that adequate fire protection is available, prior to permit approval.

CITY OF WATSONVILLE GENERAL PLAN

The Watsonville General Plan establishes goals and policies that relate to wildfire. The following are applicable to the project:

Goal 12.4: Fire Safety/Protection. Ensure that all existing structures in the city are maintained at adequate levels of fire suppression standards, that new structures conform to current fire safety standards, and the coordination is maintained between urban and rural fire districts for the prevention and suppression of structural and wildland fires.

Measure 12.F.7: Fire flow. New development shall be conditioned to provide adequate water for fire suppression in accordance with city standards for minimum volume and duration of flow.

Measure 12.F.10: Building Safety. Property owners shall be responsible for maintaining their structures at a reasonable degree of fire and life safety as identified by the uniform fire, building, mechanical, electrical and other such adopted codes and city ordinances.

Measure 12.F.11: Built-in Fire Protection. The City shall continue to promote the installation of built-in fire extinguishing systems and early warning fire alarm systems. The City acknowledges that fact that built-in fire protection is a better substitute than expanding public fire protection services.

Impacts Assessment

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, 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. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As the project site is not located in or near SRAs or lands classified as very high FHSZs, no impact would occur related to wildfire hazards, including emergency response/evacuation, pollutants and uncontrolled wildfire spread, associated infrastructure, or post-fire effects.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Does the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| <p>a. 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?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>b. 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 current projects, and the effects of probable future projects)?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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?*

The project would not degrade the quality of the environment or substantially reduce habitat of fish or wildlife species or other special-status species, as the project is located within a developed area of Watsonville. There are no sensitive habitats or wetlands located on or near the project site, and no special-status species are known to occupy the site. As discussed in Section 4, *Biological Resources*, construction of the project would require the removal of existing trees and landscaping, which migratory birds could use for nest sites. Mitigation Measure BIO-1 would require that tree

removal occur outside the migratory bird nesting season, if feasible, and if not feasible, that a nesting bird survey be performed prior to construction. With implementation of mitigation, impacts to nesting birds would be less than significant. All other biological resources impacts would be less than significant without mitigation.

The project would not eliminate important examples of the major periods of California prehistory or history. The project would not result in impacts to built historic resources, as none are located the project site. As discussed in Section 5, *Cultural Resources*, the nearest historic buildings are located approximately 0.5-mile from the project site. While a potential historic district is located adjacent to the project site, no formal evaluation of the district has been prepared, and the district is not listed on the National Register of Historic Places, the California Register of Historical Resources, or the Watsonville Historic Register. Construction activities would have the potential to encounter buried or subsurface pre-historic resources, as well as human remains. Damage or destruction of archaeological resources and human remains, if present, would be a potentially significant impact. Mitigation Measures CUL-1 and CUL-2 would require archaeological and Native American monitoring, and would require implementation of protective measures should archaeological, paleontological, or Tribal cultural resources be encountered. Implementation of mitigation would ensure that impacts related to cultural and Tribal cultural resources would be less than significant.

With mitigation, the project would not 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. Impacts would be less than significant with mitigation.

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- 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 current projects, and the effects of probable future projects)?*

Cumulative impacts could occur if the construction of other projects occurs at the same time as the proposed project and in the same geographic scope, such that the effects of similar impacts of multiple projects combine to create greater levels of impact than would occur at the project-level. For example, if the construction of other projects in the area occurs at the same time as project activities, combined air quality and noise impacts may be greater than at the project-level. The other major project planned in vicinity of the proposed project is the Downtown Watsonville Specific Plan, which envisions redevelopment of downtown Watsonville. The Downtown Watsonville Specific Plan is a long-term plan that would be implemented in phases over the course of many years. Therefore, construction of the development envisioned in the Downtown Watsonville Specific Plan could coincide with construction of the proposed project. Another project in the area is the Hillcrest Residential Development Project off of Ohlone Lane, adjacent to the Watsonville Slough. Construction of the Hillcrest Residential Development Project could also occur concurrent with construction of the proposed project.

As discussed in Section 3, *Air Quality*, emissions of pollutants resulting from the proposed project would have less than significant impacts on air quality. As described in Section 3, the project emissions are cumulative and are less than significant without mitigation. Mitigation included in this Initial Study, including Mitigation Measures BIO-1, CUL-1 and CUL-2, and GEO-1 would ensure that

impacts to biological resources, cultural resources, paleontological resources, and tribal cultural resources would be less than significant. Further, as demonstrated in the environmental topic area sections above, the project would be consistent with County of Santa Cruz General Plan policies aimed at reducing impacts related to biological and cultural resources, GHG emissions, hazards and hazardous materials, hydrology and water quality, public services, transportation, tribal cultural resources, utilities and service systems, wildfire, and other policies adopted for the purpose of mitigating environmental effects. Therefore, the project would result in an overall less-than-significant cumulative impact related to all CEQA topics addressed within this document.

LESS THAN SIGNIFICANT IMPACT

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Implementation of the project would not result in impacts that would cause a substantial adverse effect on human beings, including those related to air quality, hazardous materials, emergency response, proximity to airport activities, noise, or transportation hazards. As discussed in earlier sections of this IS-MND, these impacts would be less than significant with or without mitigation. Therefore, the project would not result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly.

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Appendix A

Conceptual Master Plan

Appendix B

CalEEMod Output Files

Appendix C

Transportation Analysis

Appendix D

Energy Calculations

Appendix E

Noise Measurements and Calculations