



Downtown Watsonville Specific Plan

Draft Environmental Impact Report

prepared by

City of Watsonville
Community Development Department
250 Main Street
Watsonville, California 95076
Contact: Justin Meek, AICP, Principal Planner

prepared with the assistance of

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

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Downtown Watsonville Specific Plan Project (DWSP or proposed project). This section summarizes the characteristics of the DWSP, alternatives to the DWSP, and the environmental impacts and mitigation measures associated with implementation of the DWSP.

Project Synopsis

Project Applicant

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Project Description

This EIR has been prepared to examine the potential environmental effects of the DWSP. The following is a summary of the full project description, which can be found in EIR Section 2, *Project Description*.

Watsonville is located in the southern area of Santa Cruz County, approximately 14 miles southeast of the city of Santa Cruz, approximately 16 miles north of the city of Salinas, and approximately 22 miles northeast of the city of Monterey. The Downtown Watsonville Specific Plan Area (plan area) encompasses approximately 195.5 acres within Downtown Watsonville, located in the southeastern portion of the City. Downtown is centered on Main Street and extends west to the edge of existing neighborhoods and the industrial district, south to the community of Pajaro, and several blocks east to the existing neighborhoods. State Route (SR) 152 runs through the approximate center of the plan area and operates along portions of Main Street and as a one-way couplet along E Lake Avenue and E Beach Street. Riverside Drive on the south end of the plan area is a part of SR 129.

The plan area includes a mix of uses which include retail, commercial, civic, religious, industrial, and residential. City Hall and the Police Station, Civic Plaza with Council Chambers, Library and County Courthouse, U.S. Post Office, and Cabrillo College are the major civic and institutional anchors in the plan area. At the center of Downtown is Main Street, along which some historic and large mixed-use buildings are located with ground-floors consisting of local retail and services while the upper levels accommodate office and residential uses. Along Walker Street, single-story industrial buildings provide much of employment opportunities in the plan area. The existing roadway network in the Downtown area consists of a multitude of varying block lengths, several curvilinear streets, and

some one-way streets. The Downtown roadway network accommodates local access through SR 152 and SR 129 while they also serve as conduits of regional travel which includes heavy truck use.

The General Plan land use designations in the plan area include Central Commercial, General Commercial, Industrial, Public/Quasi-Public, Residential High Density, and Residential Low Density. According to the City of Watsonville Zoning Map, the plan area includes Central Commercial, Central Commercial Core Area, General Industrial, Institutional, Multiple Residential-High Density, Neighborhood Commercial, Office, Public Facilities, Single Family Residential-Low Density, and Thoroughfare Commercial zoning districts.

Project Characteristics

The overarching vision of the DWSP supported by the goals and policies of the plan, which demonstrate the intentions for the physical development, redevelopment, conservation, and growth of the Downtown. The vision of the DWSP is to facilitate housing production and preservation; increase retail entertainment activity; encourage higher-density mixed-use residential projects; add visitor-oriented uses; support a greater range of civic and cultural activities; improve the safety and comfort of pedestrians; enhance bicycle infrastructure and connections; and target uses and activities that appeal to a wide range of Watsonville's residents and employees.

The DWSP would establish new zones, overlays, and development standards and guidelines to guide development and to achieve the physical outcomes envisioned for the plan area. Chapter 6 of the DWSP outlines proposed development standards and guidelines for the plan area; unless otherwise specified in the DWSP, the zoning outlined in Chapter 6 would replace existing zoning for all property within the plan area. The DWSP would establish four zoning districts and three zoning overlays within the plan area, which are summarized in Table ES-1, below.

Table ES-1 DWSP Zoning Characteristics

Zoning District or Overlay	Brief Description
Downtown Core District	Areas zoned as Downtown Core would be intended to be active, walkable environments, characterized by buildings of up to six stories. The Downtown Core would be the heart of the Downtown area, where the most active and intense development patterns and uses would be anticipated. Upper floors of development in the Downtown core could contain residential uses or office space, and buildings would be close to the sidewalk with little to no side setbacks.
Downtown Neighborhood District	Downtown Neighborhood zones would be characterized by buildings smaller in scale than those in the Downtown Core zone and would generally include a similar mix of active and residential uses.
Downtown Industrial District	Areas zoned as Downtown Industrial would allow existing industrial uses to continue to operate, while allowing for adaptive reuse of existing buildings and infill of mixed uses to occur over time. Pursuant to WMC Chapter 14-12, new industrial development would be subject to required findings of compatibility between adjacent uses related to traffic, noise, odors, visual nuisances, and other similar adverse effects.
Public Facilities District	Development proposed for parcels zoned as Public Facilities would be subject to development and use standards established by WMC Section 14-16.800-803, which outlines permitted land uses and associated development requirements for Public Facilities zones.
Main Street Overlay	The Main Street Overlay would be located in areas intended to have the most active ground floor uses. The Main Street Overlay would be contiguous so that the "main street" environment is concentrated, and not interrupted by areas containing less active environments.

Zoning District or Overlay	Brief Description
Gateway Overlay	The Gateway Overlay would extend some of the characteristics of the Main Street Overlay further down Main Street and onto select cross-streets, with some flexibility.
Neighborhood Transition Overlay	Development within the Neighborhood Transition Overlay would provide a transition between the commercial and mixed-use areas of Downtown and surrounding predominantly residential areas next to Downtown. For example, within the Neighborhood Transition Overlay, buildings height and massing would be sized down in scale compared to the Downtown Core, to be consistent with and provide a transition into the adjoining residential neighborhoods, which typically have smaller structures.

The plan area is currently developed with primarily commercial buildings and established residential neighborhoods. Hence, future potential growth is likely to be directed to a limited number of vacant or under-utilized sites that could be redeveloped. As shown in Table ES-2, the Specific Plan envisions the maximum addition of approximately 231,151 square feet of commercial space, 376,827 square feet of industrial space, and 114,572 square feet of civic space to the plan area. In addition, the DWSP envisions the addition of up to 3,886 new residential units to the plan area over the next 25 years.

Table ES-2 Maximum Growth Projections for Specific Plan Area

Land Use	Residential (du)	Commercial (sf)	Industrial (sf)	Civic (sf)
Residential	3,886			
Dining Establishment		150,248	7,537	
Retail		57,788		
Office/Research Development		23,115	94,207	
Civic				114,572
Industrial			275,084	
Total	3,886	231,151	376,827	114,572

Note: 'du' equal dwelling unit and 'sf' equals square feet, and values presented in table are approximate

Source: City of Watsonville 2022

Downtown Transportation and Mobility

Chapter 4 of the DWSP contains the mobility and transportation vision and strategies for the plan area. The DWSP includes several roadway improvements to support multimodal travel, increase safety, and improve access to local amenities and businesses. The future improvements are designed to reduce potential conflict points between motorists, people who walk, and people who bike within the plan area. Key roadway improvements include:

- Reducing the number of travel lanes on Main Street from four to three with a center running left turn lane (or landscaped median) and one lane in each direction between Riverside Drive and Freedom Boulevards (aka "road diet");
- Converting East Lake Avenue and East Beach Street, which currently operate as one-way couplets, into two-way streets;
- Squaring off the connection between Union Street and Alexander Street from East Lake Avenue to East Beach Street and vacating that portion of Union Street for private development; and

- Installing a roundabout at Freedom Boulevard and Main Street.
- Chapter 4 of the DWSP also contains a complete list of bicycle improvements within the plan area. Some examples of key bicycle improvements contained in the DWSP include: New signed bicycle route on Sudden Street between Freedom Boulevard and East Beach Street
- New signed bicycle route on Brennan Street/Union Street between Freedom Boulevard and the Levee Trail
- Improved wider bicycle lanes, with an enhanced buffer between adjacent vehicular travel lanes and the bicycle lane, on Rodriguez Street between West Lake Avenue and West Beach Street
- New bicycle lanes on Walker Street from West Riverside Drive to the Pajaro River
- New shared-use path from West Front Street along Rodriguez Street to the Levee Trail
- New signed bicycle route on Ford Street between Walker Street and Main Street
- New signed bicycle route on West 5th Street between Walker Street and Rodriguez Street
- New bicycle lanes on 5th Street between Rodriguez Street and Brennan Street

Examples of pedestrian mobility standards provided in the DWSP include continuous sidewalks; design and maintenance of pedestrian facilities; complete streets; traffic calming measures; and tactile warning measures.

Relationship to Other Plans

The DWSP considers existing and adopted plans, policies, and regulations at the city, regional, state, and federal levels. The DWSP's relationship to existing planning documents is summarized below in Table ES-3.

Table ES-3 DWSP Relationship to Other Plans

Planning Document	Summary of Relationship
Watsonville 2005 General Plan	The City of Watsonville's 2005 General Plan, adopted in 1991, establishes land uses and policies for development in the City, including within the plan area. Pursuant to California General Plan law, specific plans must be internally consistent with the jurisdiction's existing general plan. The City's General Plan is being updated concurrently with the DWSP, and the General Plan shall be updated in instances where DWSP zoning is inconsistent with land uses established by the General Plan.
Watsonville General Plan Housing Element	The City's current Housing Element, prepared for the 5 th planning cycle for the planning period of 2015 to 2023, is a required element of the City's General Plan and includes citywide strategies to address housing. The 6 th cycle Housing Element, which would cover the planning period of 2023 to 2031, would plan for the City's Regional Housing Needs Allocation of 2,053 housing units. Some or all these units could be built in Downtown Watsonville.
Watsonville Zoning Ordinance	The land use and development standards established by the DWSP would supersede the land use and development standards established by the City's Zoning Ordinance for properties within the Downtown area. Regulations not addressed in the DWSP, including but not limited to standards for specific land uses, would still be regulated by the City's Zoning Ordinance.

Planning Document	Summary of Relationship
Watsonville Complete Streets Plan	The Complete Streets Plan, adopted in 2019, provides a vision of a multi-modal, revitalized Downtown area that is accessible by users of all modes of transportation, including pedestrians, cyclists, transit riders, and motorists. The recommendations in the Complete Streets Plan would be superseded by provisions of the DWSP.
Watsonville Urban Greening Plan	The Urban Greening Plan, adopted in 2012, was developed to identify and facilitate the design of projects that address greenhouse gas (GHG) emissions or help residents adapt to challenges posed by climate change. Three of the Urban Greening Plan's six elements, including the Citywide Street Tree Program, Landscape Guidelines and Policy, and Green Roof Design Report & Criteria, are referenced in the DWSP.
Watsonville Climate Change and Adaptation Plan	The Watsonville Climate Action and Adaptation Plan was adopted in 2021 to reduce the community's GHG emissions below certain targets. As the transportation sector contributes the greatest amount of GHG emissions, the Climate Action and Adaptation Plan calls for implementing a range of strategies to reduce the number and length of vehicle trips, including facilitating smart growth, increasing multimodal transportation facilities, managing better available parking, and supporting passenger rail service. The DWSP would support these strategies through fostering high-density, infill development near transit, identifying pedestrian and bicycle enhancements, and revising parking and other development standards to reduce the transportation sector's GHG contribution by reducing single-occupant vehicle driving and encouraging alternative modes of transportation.

Project Objectives

The DWSP establishes the following guiding principles and objectives for Downtown Watsonville:

- Preserve key elements that make Downtown unique
- Establish a varied choice of uses and experiences for our diverse community
- Create diverse and inclusive housing opportunities
- Promote local economic prosperity
- Create a vibrant, safe, and active Downtown
- Foster a healthy, inclusive, and culturally connected community where all can thrive
- Re-imagine and innovate mobility options and connections
- Incorporate sustainable design elements to improve community health

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the DWSP. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

- Alternative 1: No Project Alternative
- Alternative 2: Repurposed Walker Street Industrial Uses Alternative
- Alternative 3: Reduced Density Alternative

Alternative 1 (No Project Alternative) assumes that the proposed DWSP would not be adopted or implemented. Therefore, the City's General Plan would not need to be amended to reflect the DWSP. Thus, any new development in the plan area would occur consistent with the existing land use designations and the allowed uses within each designation in the City's General Plan. Development under this alternative is anticipated to be less intensive and result in greater low-density development within the plan area compared with the DWSP, because the proposed DWSP envisions increased density compared to the General Plan. Specifically, under this alternative, the plan area would have approximately 64 housing units, approximately 1.6 million square feet of commercial space, and approximately 809,000 square feet of industrial space, all of which includes existing development already in the plan area. The transportation and mobility improvements envisioned in the DWSP would also not occur under this alternative.

Alternative 1, No Project Alternative, would result in either similar levels or reduced severity of the potentially significant and unavoidable impacts of the DWSP. For example, overall, Alternative 1 would reduce potentially significant impacts related to air quality and noise. Similar impacts would result to cultural resources and transportation. Alternative 1 would fulfill some objectives of the DWSP, but not all objectives. For example, Alternative 1 would not satisfy specific project objectives about the types and density of growth within the plan area. Because the DWSP would provide more density in the plan area compared with the General Plan, Alternative 1 could also fail to promote economic prosperity and a vibrant and active downtown when compared with the DWSP. Additionally, because the General Plan does not envision the mobility improvements contained in the DWSP, Alternative 1 would also not meet the project objective to re-imagine and innovate mobility options in the plan area.

Alternative 2 (Repurposed Walker Street Industrial Uses Alternative) would phase out existing industrial uses on Walker Street within the plan area. Under Alternative 2, the Walker Street corridor would be changed into an active transit-oriented area. The transit-oriented area would include new housing in proximity to transit and new retail, galleries, breweries, coffee roasters, and coffee shops, as well some creative offices and makerspaces. The General Plan and zoning designations for this area would be Downtown Mixed Use and Downtown Neighborhood, respectively. These designations would allow for a mix of residential and retail uses, including within the same building. Under this alternative, other parts of the plan area would remain as envisioned in the proposed DWSP.

Alternative 2 would slightly reduce impacts only to air quality compared with the DWSP. Other impacts, such as cultural resources, noise, and transportation impacts would either be similar to, or increased severity compared with the DWSP. Alternative 2 could fulfill select objectives to a greater extent than the DWSP, such as establishing a varied choice of uses and experiences downtown and creating diverse and inclusive housing opportunities. However, Alternative 2 would fail to satisfy select objectives as well as the DWSP. For example, Alternative 2 could be less successful at promoting local economic prosperity, because it would remove much of the industrial development and employment from the plan area.

Alternative 3 (Reduced Density Alternative) would reduce the residential and non-residential development density facilitated by the proposed DWSP such that approximately 25 percent fewer new residential dwelling units and 25 percent less office, commercial, dining, and industrial development square footage would be created. Generally, this would be achieved by reducing the height of new residential buildings by a story and the overall size of other types of new buildings in the plan area compared with the heights or FAR proposed or envisioned in the DWSP.

Alternative 3 would reduce or slightly reduce impacts to air quality, cultural resources, and noise, compared to the DWSP. However, compared with the DWSP, Alternative 3 would result in a slightly more severe impact related to transportation. Alternative 3 be the most effective alternative to reduce the potentially significant impacts of the DWSP. For this reason, Alternative 3 is identified as the environmentally superior alternative among the other alternatives. Alternative 3 would be feasible to implement; however, compared with the DWSP, Alternative 3 would fulfill several objectives to a lesser extent. For example, Alternative would not fulfill to the same or better level objectives related to creating inclusive housing opportunities, promoting local economic prosperity, or innovate mobility options and connections.

Refer to Section 5, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1, *Introduction*.

Issues to be Resolved

Because the DWSP is a conceptual vision for the downtown area and not a formal site plan or construction application, no permits are needed for its adoption. However, the City of Watsonville City Council must formally certify the EIR and adopt the Specific Plan, and then implement the vision and changes identified in the Specific Plan. Implementation of the Specific Plan would also require an amendment to the City's General Plan.

Issues Not Studied in Detail in the EIR

Table 1-2 in Section 1.4 summarizes issues from the environmental checklist that were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur to the following issue areas: Agriculture/Forestry Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use/Planning, Minerals, Public Services, Recreation, Utilities and Service Systems, and Wildfire. As indicated in the Initial Study, one or more impact was determined to be potentially significant in the following issue areas: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Noise, Population and Housing, Transportation, and Tribal Cultural Resources. The potentially significant for these issue areas, as indicated in the Initial Study, are addressed and evaluated in this EIR.

Summary of Impacts and Mitigation Measures

Table ES-4 summarizes the environmental impacts of the DWSP, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.

- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-4 also summarizes potentially significant impacts that appear only in the Initial Study and include mitigation measures. Table 1-2 in Section 1.4 summarizes all issues from the environmental checklist that were addressed in the Initial Study, regardless of whether mitigation is required.

Table ES-4 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. Implementation of the DWSP would have no substantial adverse effects on scenic vistas. This impact would be less than significant.	No mitigation is required.	Less than significant.
Impact AES-2. Implementation of the DWSP would establish new zoning and design standards that preserve and improve scenic quality in the plan. Impacts would be less than significant.	No mitigation is required.	Less than significant.
Impact AES-3. Implementation of the DWSP would create new sources of light and glare, but new light and glare would not be substantial. Impacts would be less than significant.	No mitigation is required.	Less than significant.
Air Quality		
Impact AQ-1. The proposed project would introduce additional housing to the area and contribute to population growth that conflicts with the growth assumptions in the Air Quality Management Plan. Impacts would be significant and unavoidable.	AQ-1 Conduct Project Specific Air Quality Analysis. The City shall require future projects that are subject to discretionary approval and that are not found to be exempt from CEQA review to evaluate potential air quality impacts as part of project-level CEQA analysis and implement respective mitigation measures to minimize impacts that exceed MBARD project level thresholds.	Significant and unavoidable.
Impact AQ-2. Construction and operation of development envisioned by the DWSP would result in the temporary and long-term generation of air pollutants, which would affect local air quality and exceed MBARD thresholds. Therefore, this impact is significant and unavoidable.	Implementation of mitigation measure AQ-1 is required.	Significant and unavoidable.

Impact	Mitigation Measure (s)	Residual Impact
<p>Impact AQ-3. The development envisioned in the DWSP would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant with implementation of mitigation measures.</p>	<p>AQ-3(a) Construction Equipment. The project applicant for individual developments or projects envisioned in the DWSP shall ensure the following requirements are incorporated into applicable bid documents, purchase orders, and contracts. Contractors shall confirm the ability to supply the compliant construction equipment prior to any ground-disturbing and construction activities:</p> <ul style="list-style-type: none"> ▪ Mobile off-road construction equipment (wheeled or tracked) greater than 50 hp used during construction of the project shall meet the U.S. EPA Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment. ▪ Mobile off-road construction equipment less than 50 hp used during construction of the individual projects shall be electric or other alternative fuel type. A copy of each unit's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each applicable unit of equipment. ▪ Electric hook-ups to the power grid shall be used instead of temporary diesel- or gasoline-powered generators, whenever feasible during construction of development or projects envisioned in the DWSP. If generators need to be used, the generators shall be non-diesel generators. <p>AQ-3(b) Operational Health Risk Assessment. The City shall require all applicants for development projects in the plan area that are within the buffer distances cited in the CARB's Air quality and Land Use Handbook: A Community Health Perspective April 2005, and incorporate any of the following features, to conduct an operational health risk assessment. The health risk assessment shall follow MBARD and the Office of Environmental Health Hazards Assessment guidelines. The health risk analysis shall mitigate the risk in exceedance of regulatory thresholds to below the regulatory thresholds. The features that shall require an operational health risk analysis include:</p> <ul style="list-style-type: none"> ▪ Incorporation of unpermitted sources (such as industrial processes that emit TACs); ▪ Incorporation of diesel heavy duty-vehicles greater than 100 trips per day; or ▪ Incorporation of more than 300 hours per week of diesel transportation refrigeration unit operations. 	<p>Less than significant.</p>

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-4. The project has the potential to create objectionable odors that would affect neighboring properties. Impacts related to odors would be less than significant with mitigation.	Implementation of mitigation measure AQ-1 is required.	Less than significant.
Impact AQ-C1. The DWSP would have a cumulatively considerable contribution to a significant cumulative impact related to emissions of air pollution and conflicts with an applicable air quality management plan.	Implementation of mitigation measures AQ-1, AQ-3(a), and AQ-3(b) are required.	Significant and unavoidable.
Biological Resources		
Impact BIO-1. Project activities could disturb known special status species or their associated habitat, including migratory nesting birds. Impacts would be less than significant with implementation of mitigation.	<p>BIO-1 Pre-Disturbance Santa Cruz Tarplant Survey and Mitigation Planting. Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping within the plan area, a focused survey for Santa Cruz tarplant shall be conducted by a qualified biologist in areas where a qualified biologist identifies suitable habitat. The survey shall be conducted during the species' blooming period (May-November), and findings of the survey shall be submitted to the City of Watsonville for review and approval.</p> <p>If a population of Santa Cruz tarplant is found, mitigation for the loss of individuals shall be conducted. Mitigation shall be achieved by establishing a new population of Santa Cruz tarplant in an area approved by the USFWS and CDFW. This area shall not be developed and shall contain suitable habitat types for establishing a new population. Mitigation shall be a 1:1 ratio (impact mitigation) of plant establishment on an acreage basis. Monitoring of the new mitigation population shall occur annually. Annual monitoring shall include quantitative sampling of the Santa Cruz tarplant population to determine the number of plants that have germinated and set seed. This monitoring shall continue annually or until success criteria have been met; once annual monitoring has documented that a self-sustaining population of this annual species has been successfully established on site, this mitigation measure shall be determined to have been met and the project applicant released from further responsibility.</p> <p>Establishment of the plant population shall be subject to a Habitat Mitigation and Monitoring Plan. To ensure the success of mitigation sites required for compensation of permanent impacts on Santa Cruz tarplant, the project applicant for specific development projects in the plan area for which this mitigation measure applies shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan. The Habitat Mitigation and Monitoring Plan shall be submitted to the City of Watsonville for review and approval prior to the start of construction. The Habitat Mitigation and Monitoring Plan shall include, at a minimum, the following information:</p>	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
	<ul style="list-style-type: none"> ▪ A summary of habitat and species impacts and the proposed mitigation for each element ▪ A description of the location and boundaries of the mitigation site(s) and description of existing site conditions ▪ A description of any measures to be undertaken to enhance (e.g., through focused management) the mitigation site for special-status species ▪ Identification of an adequate funding mechanism for long-term management ▪ A description of management and maintenance measures intended to maintain and enhance habitat for the target species (e.g., weed control, fencing maintenance) ▪ A description of habitat and species monitoring measures on the mitigation site, including specific, objective performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. Monitoring will document compliance with each element requiring habitat compensation or management. At a minimum, performance criteria will include a minimum 1:1 mitigation ratio for the number of plants in the impacted population (at least one plant preserved for each plant impacted). ▪ A contingency plan for mitigation elements that do not meet performance or final success criteria within described periods; the plan will include specific triggers for remediation if performance criteria are not met and a description of the process by which remediation of problems with the mitigation site (e.g., presence of noxious weeds) will occur ▪ A requirement that the project proponent will be responsible for monitoring, as specified in the Habitat Mitigation and Monitoring Plan, for at least three (3) years post-construction; during this period, annual reporting will be provided to the City's Supervising Environmental Planner. At the request of CDFW or USFWS, the annual reporting shall also be provided to these agencies. <p>BIO-2 Nesting Bird Avoidance. To the extent feasible, construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in Santa Cruz County extends from February 1 through August 31. If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of construction activities and shall be conducted prior to tree removal, tree trimming, or other vegetation clearing. During the survey, the biologist shall inspect all trees and other potential nesting habitats,</p>	

Impact	Mitigation Measure (s)	Residual Impact
	including trees, shrubs, ruderal grasslands, and buildings in and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the Migratory Bird Treaty Act and CFGC shall be disturbed during project implementation.	
Impact BIO-3. The project would not 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. Impacts would be less than significant.	No mitigation is required.	Less than significant.
Impact BIO-4. The project would not have a substantial adverse effect on state or federally protected wetlands. There would be no impact.	No mitigation is required.	No impact.
Impact BIO-5. The project would not substantially impede wildlife movement areas or native wildlife nursery sites. There would be no impact.	No mitigation is required.	No impact.
Impact BIO-6. Tree removal associated with potential project activities could result in damage or destruction of protected trees. However, compliance with the Watsonville municipal code would ensure that impacts would be less than significant.	No mitigation is required.	Less than significant.
Cultural Resources		
Impact CUL-1. Development envisioned in the DWSP could adversely affect known and previously unidentified historical resources. Impacts to historical resources would be significant and unavoidable.	CUL-1(a) Historical Resources Evaluation. During the planning phase for projects and development envisioned in the DWSP, and prior to permit approval for said projects and development, the City shall confirm the presence of historical resources with the potential to be impacted by the particular project or development. If the property on which the project or development is proposed is not currently designated but contains built environment features over 45 years of age, a historical resources evaluation shall be prepared by an architectural historian or historian who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in architectural history or history (36 Code of Federal Regulations Part 61). The qualified architectural historian or historian shall conduct an intensive-level survey and perform the historical evaluation in accordance with the guidelines and best practices promulgated by the	Significant and unavoidable.

Impact	Mitigation Measure (s)	Residual Impact
	<p>California Office of Historic Preservation (OHP). Properties shall be evaluated within their historic context and documented in a report meeting the California OHP guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report with attached DPR forms shall be submitted to the City for review and concurrence.</p> <p>CUL-1(b) Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. If it is determined that a proposed project site located in the DWSP plan area contains a historical resource, efforts shall be made to avoid impacts as feasible. Any relocation, rehabilitation, or alteration of a resource shall be implemented consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (the Standards). Application of the Standards shall be overseen by a qualified architectural historian or historical architect meeting the SOI PQS in architectural history or history (36 Code of Federal Regulations Part 61). In conjunction with any development application that may impact a historical resource, a report identifying and specifying proposed construction activities and the treatment of character-defining features shall be provided to the city for review and concurrence, in addition to the historical resources evaluation required by CUL-4.</p> <p>CUL-1(c) Historical Resource Documentation. If historical resources are identified on a proposed project site located in the DWSP plan area and compliance with Mitigation Measure CUL-1(b) and/or avoidance is not feasible, the project applicant or developer shall provide a report explaining why compliance with the Standards and/or avoidance is not feasible for the City's review and approval. Site-specific mitigation measures shall be established and undertaken, including, but not limited to, documentation of the historical resource in a Historic American Buildings Survey (HABS) or HABS-like report. If a HABS or HABS-like report is proposed, it shall be commissioned by the project applicant or their consultant to comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation (Federal Register Vol. 48, No. 190, pp. 44730-34) and shall generally follow the Historic American Buildings Survey Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. The documentation shall be completed by a qualified architectural historian or historian who meets the SOI PQS in architectural history or history (36 Code of Federal Regulations Part 61) and submitted to the City prior to issuance of permits for the demolition or alteration of the historical resource.</p>	
<p>Impact CUL-C1. The DWSP would have a cumulatively considerable contribution to a significant cumulative impact on historic-era cultural resources.</p>	<p>Implementation of mitigation measures CUL-1(a), CUL-1(b), CUL-1(c), and mitigation measures identified for cultural resources in the Initial Study are required. Mitigation measures identified in the Initial Study include CUL-1, CUL-2, and CUL-3.</p>	<p>Significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Residual Impact
<p>Initial Study Impact for Cultural Resources. Future development facilitated by the DWSP would have the potential to encounter subsurface resources as excavation required for construction could occur in undisturbed soil. Damage or destruction of archaeological resources would be a potential adverse change in the significance of archaeological resources. Accordingly, project impacts would be potentially significant, and mitigation is required.</p>	<p>CUL-1 Archaeological Resources Investigation. At the time of application for discretionary land use permits that involve grading, trenching, or other ground disturbance in native soil with the potential for encountering unknown archaeological resources, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior standards in archaeology to complete a Phase 1 cultural resources assessment of the development site. A Phase 1 cultural resources assessment shall include an archaeological pedestrian survey of the development site, if possible, and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research shall include a current (no more than one-year old) records search from the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC).</p> <p>Identified prehistoric or historic archaeological remains shall be avoided and preserved in place where feasible. Where preservation is not feasible, the significance of each resource shall be evaluated for significance and eligibility for listing in the CRHR through a Phase 2 evaluation. A Phase 2 evaluation shall include any necessary archival research to identify significant historical associations as well as mapping of surface artifacts, collection of functionally or temporally diagnostic tools and debris, and excavation of a sample of the cultural deposit to characterize the nature of the sites, define the artifact and feature contents, determine horizontal boundaries and depth below surface, and retrieve representative samples of artifacts and other remains.</p> <p>Cultural materials collected from the sites shall be processed and analyzed in the laboratory according to standard archaeological procedures. The age of the materials shall be determined using radiocarbon dating and/or other appropriate procedures; lithic artifacts, faunal remains, and other cultural materials shall be identified and analyzed according to current professional standards. The significance of the sites shall be evaluated according to the criteria of the CRHR. The results of the investigations shall be presented in a technical report following the standards of the California Office of Historic Preservation publication "Archaeological Resource Management Reports: Recommended Content and Format (1990 or latest edition)" (http://ohp.parks.ca.gov/pages/1054/files/armr.pdf). Upon completion of the work, all artifacts, other cultural remains, records, photographs, and other documentation shall be curated an appropriate curation facility. All fieldwork, analysis, report production, and curation shall be fully funded by the applicant.</p> <p>If the resources meet CRHR significance standards, the City shall ensure that all feasible recommendations for mitigation of archaeological impacts are incorporated into</p>	<p>Less than significant.</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>the final design and permits issued for development. If necessary, Phase 3 data recovery excavation, conducted to exhaust the data potential of significant archaeological sites, shall be carried out by a qualified archaeologist meeting the SOI standards for archaeology according to a research design reviewed and approved by the City prepared in advance of fieldwork and using appropriate archaeological field and laboratory methods consistent with the California Office of Historic Preservation Planning Bulletin 5 (1991), Guidelines for Archaeological Research Design, or the latest edition thereof.</p> <p>As applicable, the final Phase 1 Inventory, Phase 2 Testing and Evaluation, and/or Phase 3 Data Recovery reports shall be submitted to the City prior to issuance of construction permit. Recommendations contained therein shall be implemented throughout all ground disturbance activities.</p> <p>CUL-2 Archaeological Resources Construction Monitoring. During construction of development envisioned in the Specific Plan, construction activities involving ground disturbance such as grading or excavation shall be monitored by a qualified archaeologist. Archaeological monitoring shall be performed under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service, 1983). Should the construction site be determined to have little if any potential to yield subsurface cultural resources deposits, the qualified archaeologist may recommend that monitoring be reduced or eliminated after consulting with the City and Native American representatives.</p> <p>CUL-3 Unanticipated Discovery of Archaeological Cultural Resources. In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of CCR Guidelines Section 15126.4(b)(3)(C).</p>	

Impact	Mitigation Measure (s)	Residual Impact
Geology and Soils		
<p>Initial Study Impact for Geology and Soils. Future development facilitated by the DWSP would have the potential to encounter subsurface paleontological resources as excavation required for construction could occur in undisturbed soil. Damage or destruction of paleontological resources would be a potentially significant impact, and mitigation is required.</p>	<p>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.</p>	<p>Less than significant.</p>
Hazards and Hazardous Materials		
<p>Impact HAZ-1. Implementation of the DWSP could accommodate development on or near hazardous materials sites pursuant to Government Code Section 65962.5. However, compliance with applicable regulations and implementation of mitigation measures would reduce impacts to less than significant.</p>	<p>HAZ-1(a) Property Assessment – Phase I and II ESAs. Prior to the start of construction (demolition or grading) on a known hazardous site within the plan area, project applicants shall retain a qualified environmental professional (EP), as defined by ASTM E-1527, to complete one of the following.</p> <p>If the project is not listed in DTSC (GeoTracker) or SWRCB (EnviroStor) resources or other database comprising Government Code Section 65962.5, and requires more than five feet of excavation, then the proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase I ESA. If the Phase I ESA identifies recognized environmental conditions or potential concern areas, a Phase II ESA shall be prepared.</p> <p>If the project site is currently listed, previously listed, or un-listed with a regulatory closure or no further action letter in DTSC (GeoTracker) or SWRCB (EnviroStor) resources or other database comprising Government Code Section 65962.5, then the project proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase II ESA to project proponent shall test to confirm that there are no existing hazardous materials posing a risk to human health. The Phase II ESA shall determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for commercial/industrial land uses. All recommended actions included in the Phase II ESA shall be followed. This may include the preparation of a Soil Management Plan (SMP) for Impacted Soils (see below) prior to project construction and/or completion of remediation at the proposed project prior to onsite construction.</p> <p>The completed ESAs shall be submitted to the lead agency for review and approval prior to issuance of building or grading permits.</p> <p>Soil Management Plan Requirements: The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other</p>	<p>Less than significant.</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan shall be submitted to the lead agency and must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection ▪ The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. <p>The lead agency shall review and approve the development site Soil Management Plan for Impacted Soils prior to demolition and grading (construction).</p> <p>Soil Remediation Requirements: If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project proponent shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.</p> <p>The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.</p> <p>Remediation of impacted soils and/or implementation of remedial engineering controls, may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.</p> <p>The City shall review and approve the development site disposal recommendations prior to transportation of waste soils offsite and review and approve remedial engineering controls, prior to construction.</p> <p>HAZ-1(b) Phase I/II Environmental Site Assessment. If groundwater is encountered during construction on properties included on a list compiled pursuant to</p>	

Impact	Mitigation Measure (s)	Residual Impact
	<p>Government Code Section 65962.5 or through a Phase I or Phase II ESA pursuant to Mitigation Measure HAZ-1, an Environmental Professional shall be called to the site to determine safe handling procedures. The groundwater shall be pumped into appropriate containers and samples shall be obtained for chemical analysis of the Contaminants of Potential Concern in accordance with the requirements of the waste disposal facility to which the material would be sent. If water sample analytical results indicate the water is free of all detectable concentrations of Contaminants of Potential Concern, such water can be re-used at the site if deemed appropriate by the RWQCB. If water sample analytical results indicate the water contains concentrations of Contaminants of Potential Concern above appropriate RWQCB screening levels, such water shall not be re-used at the site. The contractor and the Environmental Professional shall elect to: (a) treat the groundwater onsite to render it free of detectable concentrations of Contaminants of Potential Concern (e.g., by activated carbon filtration); or, (b) transport the groundwater to a local treatment or disposal facility for appropriate handling.</p>	
Noise		
<p>Impact NOI-1. Construction of development envisioned by the DWSP would temporarily increase noise levels at nearby noise-sensitive receptors. Operation of development envisioned by the DWSP would introduce new onsite noise sources and contribute to increases in traffic noise. Construction and onsite operational noise could exceed standards. This impact would be significant and unavoidable even with mitigation.</p>	<p>NOI-1(a) Conduct Construction Noise Analysis. The City shall require future projects that are subject to discretionary approval and that are not found to be exempt from CEQA review to evaluate potential construction noise impacts on nearby sensitive uses as part of project-level CEQA analysis and implement respective mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce construction noise include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Mufflers. During excavation and grading construction phases, construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. ▪ Stationary Equipment. Stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors. ▪ Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors. ▪ Electrically-Powered Tools and Facilities. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human 	<p>Significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</p> <ul style="list-style-type: none"> ▪ Signage. For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for individuals who desire to file a noise complaint. ▪ Temporary Noise Barriers. Where necessary to meet the FTA criterion of 80 dBA Leq(8 Hr) for daytime construction affecting residential uses, erect temporary noise barriers at a height of 12 feet minimum to block the line-of-sight between construction equipment and receptors. Barriers shall be constructed with a solid material that has a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. ▪ Noise Disturbance Coordinator. The project applicant shall designate a “noise disturbance coordinator” responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site. <p>The City shall confirm that these measures are implemented during construction by monitoring the project at least once per month.</p> <p>NOI-1(b) Conduct Stationary Operational Noise Analysis. The City shall require future development projects that are subject to discretionary approval to evaluate potential onsite operational noise impacts as part of project-level CEQA analysis on nearby noise-sensitive uses and to implement any required mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce onsite noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers. The effectiveness of noise reducing measures shall be monitored to confirm effectiveness.</p>	
<p>Impact NOI-2. Construction of development envisioned by the DWSP would temporarily generate groundborne vibration. If required for construction, pile driving or use of a vibratory roller could potentially exceed FTA vibration thresholds and impact people or buildings. This impact would be significant and unavoidable even with mitigation.</p>	<p>NOI-2 Vibration Control Plan. Based on the attenuation distances of vibration from standard construction equipment, prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); a vibratory roller within 25 feet of any structure; or a dozer or other heavy earthmoving equipment within 15 feet of any structure, the project applicant shall prepare a vibration analysis to assess and mitigate potential vibration impacts related to these activities. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12</p>	<p>Significant and unavoidable.</p>

Impact	Mitigation Measure (s)	Residual Impact
	<p>in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower dozers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p> <p>Where vibration monitoring is determined to be necessary, a pre-construction baseline survey shall be conducted at buildings and structures within the screening distances by a licensed structural engineer. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. A vibration monitoring and construction contingency plan shall be developed to identify where monitoring would be conducted, set up a vibration monitoring schedule, and define structure-specific vibration limits. Construction contingencies would be identified for when vibration levels approach the limits. If vibration levels approach limits, the contractor shall suspend construction and implement contingencies to either lower vibration levels or secure the affected structure.</p> <p>Where historic structures are involved, the engineer shall provide a shoring design or other methods to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</p> <p>A Statement of Compliance signed by the applicant and owner is required to be submitted to the City of Watsonville Building Division at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person's contact information shall be posted in a location near the project site that is clearly visible to the nearby receptors most likely to be disturbed. The Director would manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.</p>	

Impact	Mitigation Measure (s)	Residual Impact
Impact NOI-C1. The construction activities for the development envisioned in the DWSP would have a cumulatively considerable contribution toward a significant cumulative impact on noise.	Implementation of mitigation measures NOI-1(a), NOI-1(b) is required.	Significant and unavoidable.
Population and Housing		
Impact POP-1. The DWSP is a plan for population growth in the downtown area of Watsonville. Therefore, the project would not induce unplanned population growth, and impacts would be less than significant.	No mitigation is required.	Less than significant.
Transportation		
Impact TRA-1. The DWSP would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities such that substantial physical environmental effects would occur. Impacts would be less than significant.	No mitigation is required.	Less than significant.
Impact TRA-2. Development envisioned in the DWSP would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be significant and unavoidable.	TRA-1 Transportation Demand Management Program. Each individual office and industrial development project in the DWSP plan area shall have a corresponding transportation demand management (TDM) plan and monitoring program developed by the applicant or developer of the project. This plan shall identify the TDM reductions specific to their project. The monitoring program shall establish goals and policies to ensure the efficient implementation of the TDM plan and demonstrate its effectiveness at reducing VMT such that VMT is below the significance thresholds presented in Table 4.8-2, above. Examples of TDM measures that could be employed, depending on specific project conditions and circumstances, include reduced parking supply, new transit stops, emergency ride home programs, bike-share programs, and traffic calming improvements.	Significant and unavoidable.
Impact TRA-C1. The DWSP would have a cumulatively considerable contribution to a significant cumulative VMT impact related to a conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision (b).	Implementation of mitigation measure TRA-1 is required.	Significant and unavoidable.

Impact	Mitigation Measure (s)	Residual Impact
Tribal Cultural Resources		
<p>Impact TCR-1. Development envisioned in the DWSP would have the potential to adversely change tribal cultural resources. Implementation of Mitigation Measure TCR-1 would reduce the impact to less than significant.</p>	<p>TCR-1 Suspension of Work In The Area of Potential Tribal Cultural Resources. In the event that potential tribal cultural resources, such as archaeological resources of Native American origin or tribal traditional tangible spaces or artifacts (historic-era and pre-contact era), are identified during implementation of a development project within the DWSP plan area, onsite project activities within 50 feet of the find shall be temporarily suspended or redirected until either an archaeologist has evaluated the nature and significance of the find (if archaeological) as a pre-contact or Native American-associated resource and an appropriate local Native American representative is consulted, or an appropriate local Native American representative is consulted regarding the significance of the resource (if not archaeological). If the City of Watsonville, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented for the specific development project in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource or providing Tribal cultural sensitivity training about the resource to applicable City staff if it will be managed, appropriate public outreach regarding the resource, or heritage recovery (recovering items of tribal cultural heritage according to established tribal customs).</p>	<p>Less than significant.</p>

1 Introduction

This document is an Environmental Impact Report (EIR) for the proposed Downtown Watsonville Specific Plan (DWSP). The City of Watsonville, as the Lead Agency, has prepared this EIR in compliance with the California Environmental Quality Act (CEQA) and the State *CEQA Guidelines*.

This section discusses: (1) EIR background; (2) project history; (3) the legal basis for preparing an EIR; (4) the scope and content of the EIR; (5) issue areas determined not to be significant; (6) the lead, responsible, and trustee agencies; and (7) the environmental review process required pursuant to CEQA. The proposed project, which is the DWSP, is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of Watsonville distributed a Notice of Preparation (NOP) of the EIR and the Initial Study for a 30-day agency and public review period starting on October 27, 2022 and ending on November 25, 2022. Although the public review period ended on November 25, the City chose to accept comments submitted as late as November 29 due to November 25 being the day after Thanksgiving holiday. The City received letters from four agencies in response to the NOP. The NOP and the responses received are presented in Appendix A of this EIR. Table 1-1 summarizes the content of the letters and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
California Department of Fish and Wildlife (CDFW)		
Erin Chappell	CDFW is a responsible agency if the project requires a discretionary approval by CDFW, and a trustee agency if the project could impact fish, wildlife, and/or plants.	Please see Section 1.1, <i>Lead, Responsible, and Trustee Agencies</i> , for a complete description of responsible and trustee agencies in context with the DWSP. As described therein, because the DWSP is a plan for development and mobility in Watsonville and does not propose specific projects requiring permits or approvals other than adoption of the DWSP, there are no responsible or trustee agencies.
Erin Chappell	Please include a complete description of the project in the EIR.	A complete project description is provided in Section 2, <i>Project Description</i> , of the EIR.
Erin Chappell	Please be advised that a California Endangered Species Act incidental take permit must be obtained if the project would result in take of applicable plants or animals.	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of the California Endangered Species Act and an assessment of potential impacts to special-status plant and animal species.
Erin Chappell	The plan area is adjacent to the Pajaro River and impacts to the river or associated riparian habitat would likely require a Lake and Streambed Alteration Notification.	Potential impacts to wetlands and other jurisdictional waters are discussed in Section 4.2, <i>Biological Resources</i> , of the EIR. Likewise, potential DWSP impacts to riparian habitat are also discussed in Section 4.2.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Erin Chappell	CDFW has authority over actions impacting migratory birds and their nests, and these birds and their nests are protected under state and federal regulations.	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of potential impacts to special-status plant and animal species, including migratory nesting birds.
Erin Chappell	Fully protected species may not be taken at any time.	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of potential impacts to special-status plant and animal species, which includes fully protected species.
Erin Chappell	CDFW recommends that a site-specific analysis provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the plan area and surrounding area. The site-specific analysis should be prepared by a qualified biologist and provide sufficient information regarding the environmental setting ("baseline") to understand potentially significant impacts on the environment	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of the existing setting and potential impacts to special-status plant and animal species. Additionally, a list of the special-status species with records of occurrence in or near the plan area and their potential to occur within or near the plan area is provided as Appendix C to the EIR.
Erin Chappell	A site-specific analysis should discuss all direct and indirect impacts of the DWSP on biological resources, including reasonably foreseeable impacts, that may occur with implementation of the DWSP.	The DWSP articulates a community vision and planning framework that would serve as a guide for the City and other public agency decision-makers, community members, and stakeholders over the next 20 to 30 years. The DWSP would provide a comprehensive land use and mobility plan, along with development and design regulations, to guide future public and private development in the downtown area of Watsonville. The DWSP does not propose specific projects on specific sites. Accordingly, potential impacts of the DWSP are evaluated at a program level throughout this EIR. Potential impacts to biological resources are evaluated in both the Initial Study (Appendix A) and Section 4.3, <i>Biological Resources</i> .
Erin Chappell	The EIR should evaluate cumulative impacts on the DWSP and other reasonably foreseeable projects on biological resources.	Cumulative impacts of the DWSP on biological resources are evaluated in Section 4.3, <i>Biological Resources</i> .
Erin Chappell	The EIR should provide enforceable mitigation measures to reduce potentially significant impacts to biological resources.	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of the potentially significant impacts of the DWSP on biological resources and the mitigation measures to reduce or avoid those impacts.
Erin Chappell	The project has potential to impact riparian zones and riparian setbacks should be provided in the EIR to avoid or reduce this impact.	Potential impacts to riparian zones and vegetation are discussed in Section 4.3, <i>Biological Resources</i> , of the EIR. As described therein, riparian zones do not occur in the plan area. No significant impacts to riparian zones have been identified. Therefore, no mitigation measures to reduce potentially significant impacts to riparian zones are required or necessary.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Erin Chappell	The project would increase impervious surface, which could in turn affect stormwater runoff and the hydrology of waterways supporting fish and wildlife. The EIR should mitigate this impact with low impact development, bioswales, and providing more permeable solutions to stormwater on project sites.	Potential impacts to hydrology and stormwater water runoff, including impacts resulting from changes in impervious surfaces and stormwater runoff are analyzed in the Initial Study (see Appendix A). As described therein, no significant impacts to drainage patterns or hydrology and water quality have been identified. Therefore, no mitigation measures to reduce potentially significant impacts related to hydrology and water quality are necessary or identified in this EIR.
Erin Chappell	The project has the potential increase artificial lighting and adversely impact wildlife. CDFW recommends mitigating this impact by eliminating artificial lighting, shielding lights, and limiting times of the day and night lights are used.	Potential impacts wildlife, including indirect lighting impacts, are discussed in Section 4.3, <i>Biological Resources</i> , of the EIR. As described therein, the City's municipal code contains requirements for exterior lighting, which would reduce lighting impacts of the DWSP, and impacts would be less than significant. Therefore, no mitigation measures to reduce potentially significant impacts related to lighting on wildlife are necessary or identified in this EIR.
Erin Chappell	The project has the potential increase noise and adversely impact wildlife. CDFW recommends mitigating this impact by restricting construction to daylight hours and protecting birds with nesting bird surveys and avoidance of identified active nests, as well as conducting construction outside of the nesting season.	Please see Section 4.3, <i>Biological Resources</i> , for a discussion of the potentially significant impacts of the DWSP on biological resources, including indirect noise impacts and migratory nesting bird impacts. Section 4.3 provides applicable mitigation measures to reduce or avoid these impacts.
Erin Chappell	Please report occurrences of special-status species detected during project surveys to the CDFW California Natural Diversity Database.	The DWSP articulates a community vision and planning framework that would serve as a guide for the City and other public agency decision-makers, community members, and stakeholders over the next 20 to 30 years. The DWSP would provide a comprehensive land use and mobility plan, along with development and design regulations, to guide future public and private development in the downtown area of Watsonville. The DWSP does not propose specific projects on specific sites. No project site surveys are proposed.
Erin Chappell	The CDFW filing fees for environmental review are likely required for this EIR.	This comment pertains to a required fee payment at the time the Notice of Determination is filed. The Notice of Determination is only filed after a project is approved or adopted, which first requires certification of the EIR. Therefore, because this comment pertains to requirements occurring after preparation and certification of the EIR, this comment does not pertain to the contents of the EIR.

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
California Department of Transportation (Caltrans)		
Chris Bjornstad	Caltrans supports local development that is consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. Projects that support smart growth principles which include improvements to pedestrian, bicycle, and transit infrastructure (or other key Transportation Demand Strategies) are supported by Caltrans and are consistent with our mission, vision, and goals.	This comment explains the types of urban development preferred by Caltrans. This comment does not pertain to impacts or mitigation measures for the DWSP and EIR. Accordingly, this comment is not evaluated in the EIR. However, Section 2.5.1, <i>DWSP Objectives</i> , of the EIR describes objectives of the DWSP. As described therein, objectives include concepts listed in this comment, such as promoting equity in housing and mobility.
Chris Bjornstad	The DWSP would help achieve goals of Senate Bill 743.	Potential transportation impacts of the project, including consistency with SB 743 goals, are analyzed in Section 4.8, <i>Transportation</i> .
Chris Bjornstad	Caltrans looks forward to continuing working with the City of Watsonville on transportation concepts within state right-of-way. This includes the feasibility of converting the existing couplet portion of SR 152 from a one-way street into a two-way street.	This comment describes a desire to continue working with the City on transportation plans and improvements within SR 152. Accordingly, this comment is not evaluated in the EIR.
California Department of Toxic Substances Control		
Gavin McCreary	A state environmental regulatory agency such as Department of Toxic Substances Control, a Regional Water Quality Control Board (RWQCB), or a local agency should provide regulatory concurrence that project site is safe for construction and the proposed use.	The DWSP is a plan that envisions the future of the downtown area of Watsonville. Specific projects on specific sites are not proposed at this time. However, a programmatic analysis of potential impacts related to development within the plan area in context with hazardous materials and contamination is provided in Section 4.5, <i>Hazards and Hazardous Materials</i> .
Gavin McCreary	The EIR should acknowledge the potential for historic or future activities on or near the plan area to result in the release of hazardous wastes/substances. The EIR should also identify the mechanism(s) to initiate required investigation and/or remediation and the government agency responsible for providing appropriate regulatory oversight.	Potential impacts of the DWSP related to hazardous wastes and releases and applicable mitigation measures are provided in Section 4.5, <i>Hazards and Hazardous Materials</i> .
Gavin McCreary	Due to the potential for lead-contaminated soil, soil samples should be collected and analyzed for lead prior to performing any intrusive activities for the project described in the EIR.	The DWSP does not propose specific projects on specific sites. No project site soil sampling is proposed at this time. However, potential impacts of the DWSP related to hazardous wastes and releases, including through exposure to contaminated soils, generally, and applicable mitigation measures to reduce these impacts are provided in Section 4.5, <i>Hazards and Hazardous Materials</i> .
Gavin McCreary	If buildings or other structures are to be demolished, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk.	Potential impacts related to release of hazardous materials during potential demolition are evaluated in Section 4.5, <i>Hazards and Hazardous Materials</i> .

Commenter	Comment/Request (Summarized)	How and Where it was Addressed
Gavin McCreary	If any projects initiated as part of the DWSP require the importation of soil to backfill excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination.	No specific projects or grading permits are proposed as part of the DWSP. It is unknown if soil imports would be required because no projects have been proposed or designed. However, potential impacts related to exposure to hazardous materials, including soils, and mitigation measures to reduce these impacts are provided in Section 4.5, <i>Hazards and Hazardous Materials</i> .
Gavin McCreary	If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR.	The DWSP does not propose specific projects on specific sites. No project site soil sampling is proposed because there are no specific project sites at this time. The plan area is the urbanized downtown area of Watsonville, which is developed and not used for agriculture. Regardless, please see Section 4.5, <i>Hazards and Hazardous Materials</i> , for mitigation measures to ensure potentially contaminated soils in the plan area do not result in significant impacts.
California Native American Heritage Commission		
Cody Campagne	The project may require the City to conduct tribal consultation pursuant to either Assembly Bill (AB) 52 or Senate Bill (SB) 18, or both. The commenter provides a detailed summary of how to conduct consultation pursuant to AB 52 and SB 18.	The City has conducted the required tribal consultation for the DWSP EIR, including both AB 52 and SB 18 consultation. Please see Section 4.9, <i>Tribal Cultural Resources</i> , for a discussion of the consultation that occurred between the City and applicable tribes or other Native American representatives.

The City also held a public scoping meeting on November 30, 2022, to hear and collect public input on the contents of the EIR, especially as it relates to impacts and potential mitigation measures or alternatives to reduce impacts. The public scoping meeting was held in virtual format (i.e., online) due to the continued COVID-19 pandemic. No formal comments on the EIR were submitted during the scoping meeting. However, a representative from Pajaro Valley Water Management Agency spoke and indicated their comment was informal. The comment from Pajaro Valley Water Management Agency pertained to water supply and associated groundwater withdrawal as it related to cumulative impacts. Cumulative impacts to water supply as discussed in Section 19, *Utilities and Service Systems*, of the Initial Study. The Initial Study is included as Appendix A to this EIR.

1.2 Statement of Purpose and Legal Authority

This EIR has been prepared in compliance with the CEQA Statutes and State *CEQA Guidelines* (see Section 15121(a)). In general, the purpose of an EIR is to:

- Analyze the environmental effects of the adoption and implementation of the project;
- Inform decision-makers, responsible and trustee agencies, and members of the public as to the range of the environmental impacts of the project;
- Recommend a set of measures to mitigate significant adverse impacts; and
- Analyze a range of reasonable alternatives to the proposed project.

As the lead agency for preparing this EIR, the City of Watsonville will rely on the EIR analysis of environmental effects in their review and consideration of the proposed DWSP prior to acting on the project.

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are by necessity more general and may contain a more wide-ranging discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the *State CEQA Guidelines*, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the City of Watsonville in its role as lead agency with the opportunity to consider broad alternatives and program-wide mitigation measures. It also provides the City with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis. Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a Program EIR considers the broad effects associated with implementing a program (such as a Specific Plan or General Plan) and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be accommodated by the provisions of Specific or General Plans.

Once a Program EIR has been certified, subsequent activities within the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. Depending on how detailed the Program EIR addresses the program's effects, subsequent activities may be found to be within the Program EIR scope and additional environmental documentation may not be required or may be minimal (*State CEQA Guidelines* Section 15168(c)). When a lead agency relies on a Program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the Program EIR into the subsequent activities (*State CEQA Guidelines* Section 15168(c)(3)). If a subsequent activity would have effects not contemplated or not within the scope of the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or a project-level EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. Section 15168(b) of the *State CEQA Guidelines* encourages the use of Program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR;
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis;
3. Avoidance of continual reconsideration of recurring policy issues;
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them; and
5. Reduction of paperwork by encouraging the reuse of data (through tiering).

As a wide-ranging environmental document, the Program EIR uses expansive thresholds as compared to the project-level thresholds that might be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a program level would not be significant at a project level. In other words, determination that implementation of the proposed project as a program would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with the DWSP.

This EIR has been prepared to analyze potentially significant environmental impacts associated with future development resulting from implementation of the DWSP, and identifies appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. Additionally, this EIR provides the primary source of environmental information for the City of Watsonville, which is the lead agency, to use when considering the proposed project.

This document is also intended to provide decision-makers and the public with information that enables intelligent consideration of the environmental consequences of the proposed DWSP. It identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less-than-significant levels, whether through the imposition of mitigation measures or through the implementation of specific alternatives to the proposed project. In a practical sense, this document functions as a tool for fact-finding, allowing concerned citizens and City staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

1.3 Scope and Content

This EIR incorporates by reference and as inclusion as Appendix A the Initial Study prepared for the proposed project. This EIR addresses and evaluates impacts identified in the Initial Study to be potentially significant. Potentially significant impacts were identified in the following issue areas and are therefore studied in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Noise
- Population/Housing
- Transportation
- Tribal Cultural Resources

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References*.

Section 5, *Alternatives*, of the EIR was prepared in accordance with Section 15126.6 of the *State CEQA Guidelines* and focuses on alternatives that can eliminate or reduce significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the environmentally superior alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required No Project Alternative and two other alternative scenarios for the plan area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *State CEQA Guidelines* provides the standard of adequacy on which this document is based. The *State CEQA Guidelines* state:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Issue Areas Determined Not to be Significant

Table 1-2 summarizes the issues from the environmental checklist that were addressed in the Initial Study (Appendix A). As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in these issue areas.

Table 1-2 Summary of Issue Areas Determined Not to Be Significant

Issue Area	Initial Study Findings
Aesthetics; CEQA Checklist Question 'b'	Because the plan area is not within a state scenic highway, the proposed project would have no impacts to state scenic highways.
Agricultural and Forestry Resources; CEQA Checklist Question 'a'	The plan area is not zoned for agricultural use and does not contain any Williamson Act lands. There would be no impacts to agricultural zoning or Williamson Act contracts.
Agricultural and Forestry Resources; CEQA Checklist Question 'b'	The plan area does not contain Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. There would be no impacts to Farmland.
Agricultural and Forestry Resources; CEQA Checklist Question 'c'	The plan area is not zoned as forest land, timberland, or timberland production. There would be no impacts on forestry resources or forest land.
Agricultural and Forestry Resources; CEQA Checklist Question 'd'	The plan area is not zoned for agricultural use, forest land, timberland, or timberland production. Therefore, the proposed project would not result in the conversion of agriculture or timberland property to non-agricultural or non-forest uses.
Biological Resources; CEQA Checklist Question 'f'	There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans applicable to the plan area. The proposed DWSP would have no impacts related to conflicts with these types of plans.
Cultural Resources; CEQA Checklist Question 'b'	Construction of development envisioned in the DWSP would have the potential to impact archaeological resources, if present below ground surface. The combination of mitigation measures CUL-1 through CUL-3 in the Initial Study and compliance with existing regulations would reduce impacts to less than significant.
Cultural Resources; CEQA Checklist Question 'c'	Construction of development envisioned in the DWSP would have the potential to impact unknown human remains, if present below ground surface. Mandatory adherence to state regulations would ensure impacts to human remains, if any, would be less than significant.
Energy; CEQA Checklist Question 'a'	Development envisioned in the DWSP would increase energy use on the site compared to existing conditions. However, energy use would be in conformance with the latest version of CALGreen and the Building Energy Efficiency Standards. Moreover, the DWSP envisions placing people and jobs, as well as other commercial uses, in proximity to each other to reduce vehicle trips and associated gasoline consumption. Therefore, the DWSP would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant.

Issue Area	Initial Study Findings
Energy; CEQA Checklist Question 'b'	The plan would not conflict with the energy-related policies of the City's Climate Action and Adaptation Plan or City's General Plan, and would also be required to comply with the energy standards in the California Building Energy Efficiency Standards. Therefore, impacts would be less than significant.
Geology and Soils; CEQA Checklist Question 'a'	The plan area is subject to earthquakes and seismic-related hazards, such as strong ground shaking. The City has adopted the California Building Code (CBC) and incorporated it into the Watsonville Municipal Code as Chapter 2 to Title 8, Sections 8-2.01 through 8-2.05. All new development would be constructed compliant to the CBC to reduce the impacts resulting from seismic hazards. Additionally, the City's Municipal Code requires preparation of project-specific geotechnical investigations, and recommendations in the geotechnical investigation must be incorporated into the project design. Incorporation of geotechnical recommendations would prevent or reduce seismic damage and risks in new development. Impacts would be less than significant.
Geology and Soils; CEQA Checklist Question 'b'	Construction of development envisioned in the DWSP would disturb soils and increase the potential for erosion and loss of topsoil. However, mandatory compliance with the NPDES requires implementation of best management practices to prevent erosion of loss of topsoil from project sites. Impacts would be less than significant.
Geology and Soils; CEQA Checklist Question 'c'	The plan area is not located on a geologic unit or soil that is unstable or would result in landslide, lateral spreading, subsidence, liquefaction, or collapse. However, all new development would be constructed compliant to the CBC to reduce the impacts resulting from seismic hazards. Additionally, the City's Municipal Code requires preparation of project-specific geotechnical investigations, and recommendations in the geotechnical investigation must be incorporated into the project design. Incorporation of geotechnical recommendations would prevent or reduce seismic damage and risks in new development. Impacts would be less than significant.
Geology and Soils; CEQA Checklist Question 'd'	The plan area is underlain by soils considered not expansive. Impacts related to expansive soils would be less than significant.
Geology and Soils; CEQA Checklist Question 'e'	The plan area is fully served by the City's sanitary sewer system. Septic tanks or alternative wastewater disposal systems would not be required for new development envisioned in the DWSP. The DWSP would have no impacts related to septic tanks or alternative wastewater disposal systems.
Geology and Soils; CEQA Checklist Question 'f'	Construction of development envisioned in the DWSP could impact subsurface paleontological resources. However, implementation of mitigation measure GEO-1 in the Initial Study would be required. Mitigation measure GEO-1 requires construction to stop if resources are uncovered, and activities near the resource must continue to be stopped until a paleontologist investigates the resources and treated, as applicable. Impacts would be less than significant with implementation of mitigation.
Greenhouse Gas Emissions; CEQA Checklist Question 'a'	The DWSP would be consistent with the Watsonville Climate Action and Adaptation Plan, and accordingly, would not generate greenhouse gas (GHG) emissions that result in significant impacts. Impacts related to GHG would be less than significant.
Greenhouse Gas Emissions; CEQA Checklist Question 'b'	The DWSP would be consistent with policies from the City's Climate Action and Adaptation Plan, which is a qualified Climate Action Plan. Impacts would be less than significant.
Hazards and Hazardous Materials; CEQA Checklist Question 'a'	Future development envisioned in the DWSP is a mix of industrial, commercial, civic, and residential uses. Residential and civic uses generally would not require the routine handling or disposal of hazardous materials in quantities substantial enough to result in significant hazards to the public. Other uses, such as industrial, could require the hazardous materials to be used, stored, and disposed of in more substantial quantities. However, the routine use of hazardous materials would be in compliance with existing regulations that reduce hazards and risks. Impacts would be less than significant.

City of Watsonville
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Issue Area	Initial Study Findings
Hazards and Hazardous Materials; CEQA Checklist Question 'c'	Mandatory compliance with regulations would also reduce risks of hazardous materials routinely used within 0.25 mile of schools. Impacts associated with the routine transport, use, or disposal of hazardous materials and within proximity to schools would be less than significant.
Hazards and Hazardous Materials; CEQA Checklist Question 'e'	The project would have no impact related to safety hazards within the planning area of an airport land use plan because the DWSP plan area is not within such a planning area and the nearest airport is more than two miles away from the plan area.
Hazards and Hazardous Materials; CEQA Checklist Question 'f'	Future development envisioned in the DWSP could require temporary street or roadway lane closures during construction. However, the City and Watsonville Fire Department must be made aware of closures to ensure emergency response operations are not hindered. Road diets and modifications envisioned in the DWSP would include center turning lanes and parallel parking that vehicles could use as pullouts to allow emergency vehicles to safely pass. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan. Impacts would be less than significant.
Hazards and Hazardous Materials; CEQA Checklist Question 'g'	The plan area is located in the downtown area of Watsonville, which is characterized by buildings, sidewalks, roads, and other urban development. Wildfire fuels, such as forest or brushland are not present in the plan area. The proposed project would have no impact related to risks associated with wildfire hazards.
Hydrology and Water Quality; CEQA Checklist Question 'a'	Future development envisioned in the DWSP would require ground disturbance and excavation that could increase the potential for soil erosion and subsequent siltation of surface waters. Mandatory implementation of a Stormwater Pollution Prevention Plan (SWPPP) and its best management practices would prevent erosion and siltation. The plan area is served by existing storm drain that would capture and treat runoff. Accordingly, the DWSP would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant.
Hydrology and Water Quality; CEQA Checklist Question 'b'	The plan area does not coincide with groundwater recharge areas, and water demand for the future development envisioned in the DWSP would be met with the City's unused water supplies. Therefore, the DWSP would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.
Hydrology and Water Quality; CEQA Checklist Question 'c'	The DWSP would not substantially alter the existing drainage pattern of the plan area, because the plan area is urbanized and largely developed with impervious surfaces in its existing condition. Impacts related to altered drainages in context with increased flooding, exceeding storm drain capacity, or impede flood flows would be less than significant.
Hydrology and Water Quality; CEQA Checklist Question 'd'	The plan area is not subject to tsunami, but portions of the plan area could be inundated by floodwaters or seiche. However, the DWSP would primarily facilitate infill development and redevelopment, and would therefore not substantially increase the risk of the release of pollutants during inundation. Additionally, Section 9-2.502 of the Watsonville Municipal Code prohibits the storage of materials which in the time of a flood are buoyant, flammable, explosive, or could otherwise be injurious to human, animal, or plant life. For these reasons, impacts related to release of pollutants due to inundation would be less than significant.
Hydrology and Water Quality; CEQA Checklist Question 'e'	The City's water supply is primarily from groundwater sources. The future development envisioned in the DWSP would increase demand for water. However, the City does not utilize its full allotment of water supplies. Water demand generated from the future development in the DWSP would be met with the existing water supply. The DWSP would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.
Land Use and Planning; CEQA Checklist Question 'a'	The plan area is currently developed with existing residential and commercial uses. Therefore, the addition of buildout of the DWSP would not generate additional barriers to community connectivity compared to existing conditions on the site. The Specific Plan does not include the construction of barriers such as roadways or other dividing features that would physically divide an established community. Therefore, the DWSP would have no impact related to physically dividing an established community.

Issue Area	Initial Study Findings
Land Use and Planning; CEQA Checklist Question 'b'	The land use components of the DWSP would help the City achieve its objective of incorporating higher density commercial and housing opportunities by accommodating additional residential uses in a compact and active mixed-use environment through both new construction and adaptive reuse of historic or existing buildings. Because the plan area is mostly developed with commercial buildings and established residential neighborhoods, the DWSP directs future potential growth toward a limited number of vacant or under-utilized sites that could be redeveloped in the downtown area. This would prevent conflicts with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects, and impacts would be less than significant.
Mineral Resources; CEQA Checklist Question 'a'	The plan area contains no known or mapped mineral resources. Therefore, the DWSP would have no impact to mineral resources.
Mineral Resources; CEQA Checklist Question 'b'	The plan area contains no active mineral extraction operations. Additionally, the DWSP would facilitate development within the previously developed downtown of Watsonville and would not result in a loss of available minerals. Thus, the DWSP would have no impact to mineral resources.
Noise; CEQA Checklist Question 'c'	The plan area is not within an airport land use plan boundary or within two miles of an airport. Therefore, the DWSP would not expose people residing or working in the project area to excessive noise levels within or proximate to an airport.
Population and Housing; CEQA Checklist Question 'b'	The DWSP includes strategies to prevent housing displacement, such as Policy 7.1 and Policy 7.2, which look to reinvest in existing affordable housing and stabilize existing neighborhoods. Furthermore, the intent of the DWSP is to create more housing units within Downtown Watsonville over the next 25 years, while maintaining existing neighborhoods. Therefore, the proposed project would not displace substantial numbers of existing people or housing. There would be no impact.
Public Services; CEQA Checklist Question 'a'	The plan area consists of the downtown area of Watsonville, which is served by existing public services, such a fire and police. The DWSP envisions modification to fire department facilities, but the modifications would occur as infill on a site that is already developed downtown. Therefore, the DWSP would have less than significant environmental impacts related to expansion or construction of new public services.
Recreation; CEQA Checklist Question 'a'	The DWSP would not result in substantial adverse physical effects or accelerated deterioration of recreational facilities. Given the proximity of the Watsonville City Plaza, Marinovich Park and Community Center, Callaghan Park, Ramsay Park, and the Pajaro River Park, most residents would likely walk to existing parks, and given the nature of the downtown land uses, there would not be demand for new parks. Parks would continue to be routinely maintained, consistent with existing conditions. Impacts related to recreation would be less than significant.
Recreation; CEQA Checklist Question 'b'	The DWSP does not envision new or expanded recreational facilities that would have an adverse physical effect on the environment. Impacts would be less than significant.
Transportation; CEQA Checklist Question 'c'	The DWSP would not alter roadways to include new sharp curves or new dangerous intersections. Further, the DWSP would facilitate residential, commercial, and industrial development, uses that already exist within the downtown area; therefore, the DWSP would not introduce new types of vehicle traffic or incompatible uses. Transportation impacts related to hazards or incompatible uses would be less than significant.
Transportation; CEQA Checklist Question 'd'	Development facilitated by the DWSP would be required to comply with the City's standards for emergency vehicle access (including providing adequate points of access, vertical clearance, and turning radius). Road diets and modifications envisioned in the DWSP would include center turning lanes and parallel parking that vehicles could use as pullouts to allow emergency vehicles to safely pass. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

Issue Area	Initial Study Findings
Utilities and Service Systems; CEQA Checklist Question 'a'	Future development envisioned in the DWSP would not require the relocation of water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. These utilities exist within the plan area. Impacts related to the relocation or provision of new utilities would be less than significant.
Utilities and Service Systems; CEQA Checklist Question 'b'	The City's water supply is primarily from groundwater sources. The future development envisioned in the DWSP would increase demand for water. However, the City does not utilize its full allotment of water supplies. Water demand generated from the future development in the DWSP would be met with the existing water supply. The future development would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years, and impacts would be less than significant.
Utilities and Service Systems; CEQA Checklist Question 'c'	The wastewater generated from development envisioned in the DWSP would be treated at the existing wastewater treatment facility, which has adequate capacity for the DWSP development. Impacts related to wastewater treatment capacity would be less than significant.
Utilities and Service Systems; CEQA Checklist Question 'd'	The solid waste generated by development envisioned in the DWSP would be sent to local landfills, which have adequate capacity for the DWSP development. Impacts related to solid waste would be less than significant.
Utilities and Service Systems; CEQA Checklist Question 'e'	Solid waste generated by the DWSP would be required to comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.
Wildfire; CEQA Checklist Question 'a'	The plan area is not within or near state responsibility areas or lands classified as very high fire hazard severity zones and would the project substantially impair an adopted emergency response plan or emergency evacuation plan. There would be no impact.
Wildfire; CEQA Checklist Question 'b'	The plan area is not within or near state responsibility areas or lands classified as very high fire hazard severity zones. The plan area is located in the downtown area of Watsonville, which is characterized by buildings, sidewalks, roads, and other urban development. The DWSP would not expose plan area occupants to pollutants from a wildfire. There would be no impact.
Wildfire; CEQA Checklist Question 'c'	The plan area is not within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not require the installation of infrastructure that might exacerbate fire risk. There would be no impact.
Wildfire; CEQA Checklist Question 'd'	The plan area is not within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not expose people or structures to flooding or landslides as a result of post-fire instability. There would be no impact. .

1.5 Lead, Responsible, and Trustee Agencies

The State *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Watsonville is the lead agency for the project because it holds principal responsibility for approving the DWSP.

Section 15381 of the State *CEQA Guidelines* defines responsible agencies as a public agency other than the lead agency that has discretionary approval over the project.

Section 15386 of the State *CEQA Guidelines* designates four agencies as trustee agencies:

- CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves;
- State Lands Commission with regard to state-owned "sovereign" lands, such as the beds of navigable waters and State school lands;
- California Department of Parks and Recreation with regard to units of the State park system; and

- The University of California with regard to sites within the Natural Land and Water Reserves System.

Because there DWSP is a plan for development and mobility in Watsonville and does not propose specific projects requiring permits or approvals other than adoption of the DWSP there are no responsible or trustee agencies. Additionally, resources or land under the jurisdiction may not occur with the DWSP plan area, such as land within the State park system.

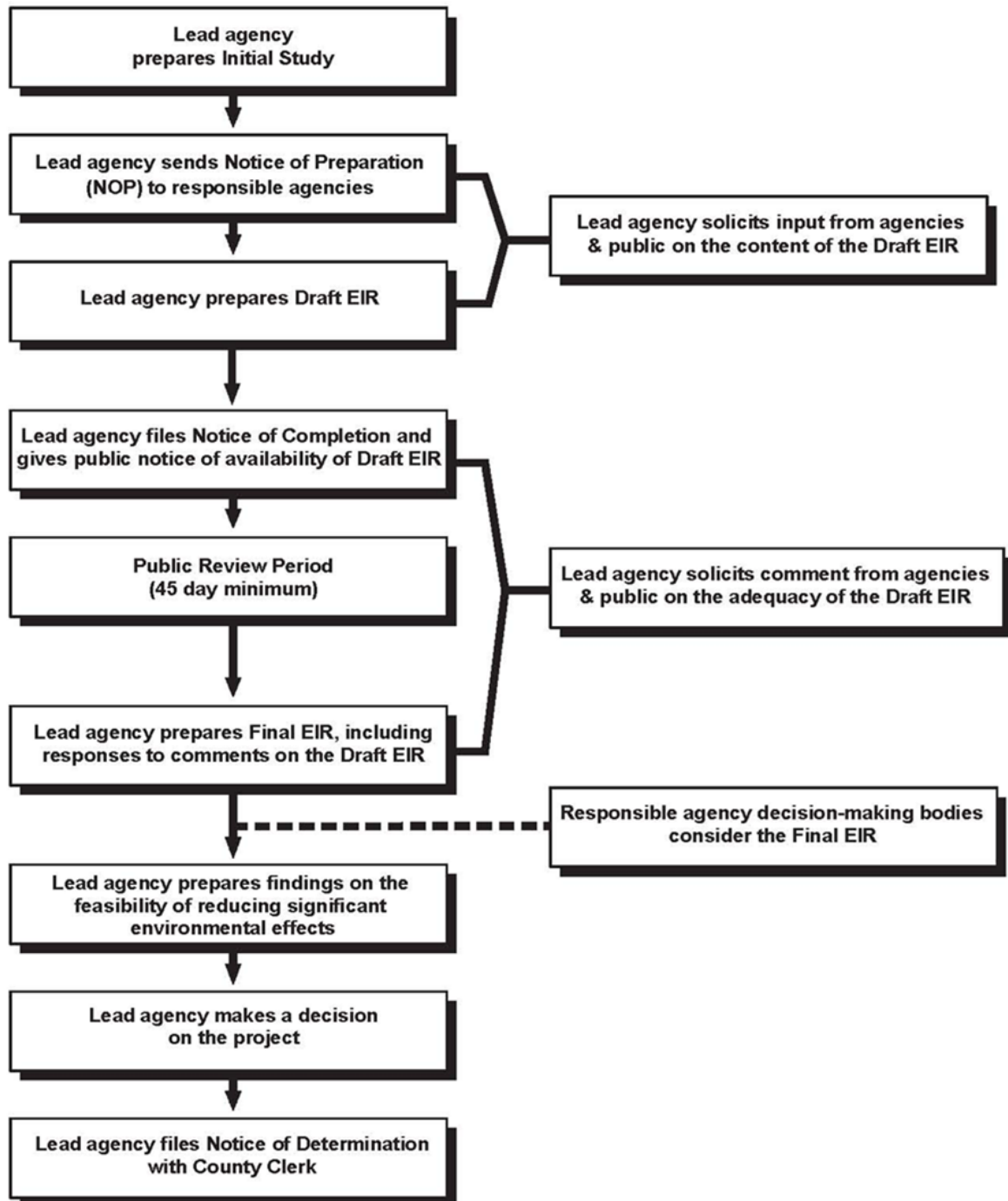
1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

- **Notice of Preparation (NOP) and Initial Study.** After deciding that an EIR is required, the lead agency (City of Watsonville) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (State *CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
- **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
- **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (State *CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
- **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
- **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (State *CEQA Guidelines* Section 15090).
- **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental

effects, if the proper findings and statement of overriding considerations are adopted (State *CEQA Guidelines* Sections 15042 and 15043).

- **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State *CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
- **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
- **Notice of Determination (NOD).** The lead agency must file an NOD after deciding to approve a project for which an EIR is prepared (State *CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Typical CEQA Process

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2 Project Description

This section describes the proposed project, including the lead agency, project objectives, project characteristics, and discretionary actions needed for approval.

2.1 Project Title and Brief Description

The project title is the “Downtown Watsonville Specific Plan Project” (hereinafter referred to as ‘DWSP’ or ‘project’). The DWSP articulates a community vision and planning framework that would serve as a guide for the City and other public agency decision-makers, community members, and stakeholders over the next 20 to 30 years. The DWSP would provide a comprehensive land use and mobility plan, along with development and design regulations, to guide future public and private development in the downtown area of Watsonville.

2.2 Lead Agency Name, Address, and Contact Person

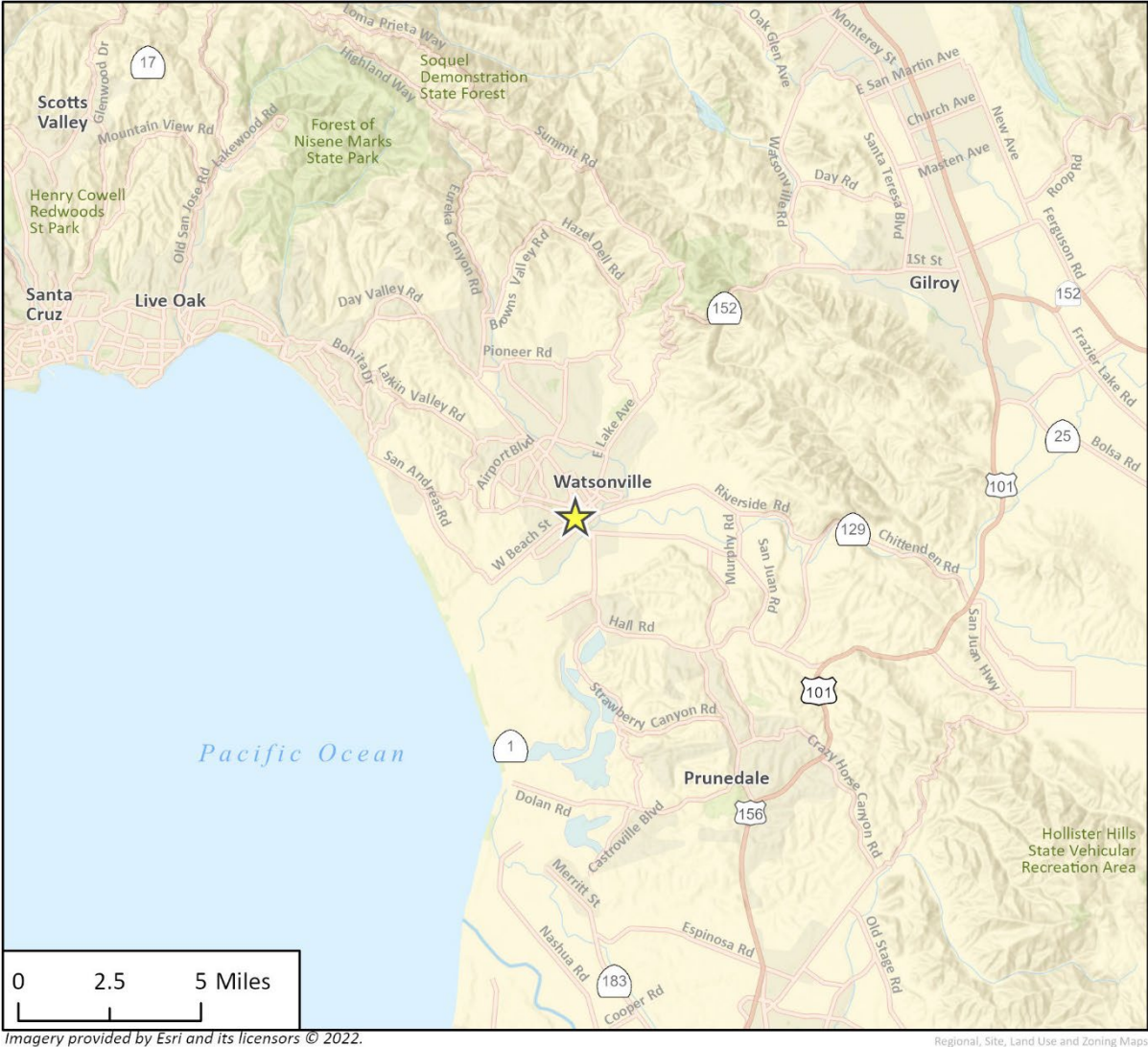
City of Watsonville
Planning Division
250 Main Street
Watsonville, California 95076
Justin Meek, AICP Principal Planner
831-768-3050

2.3 Project Location

Watsonville is located in the southern area of Santa Cruz County, approximately 14 miles southeast of the city of Santa Cruz, approximately 16 miles north of the city of Salinas, and approximately 22 miles northeast of the city of Monterey. Watsonville is bordered by the unincorporated communities of Freedom to the north, Interlaken to the east, and Pajaro to the south. The Monterey Bay/Pacific Ocean is approximately three miles west of the City.

The Downtown Watsonville Specific Plan Area (plan area) encompasses approximately 195.5 acres within Downtown Watsonville, located in the southeastern portion of the City. Approximately 55.5 acres (28 percent) of the plan area is dedicated to streets and rights-of-way. Downtown is centered on Main Street and extends west to the edge of existing neighborhoods and the industrial district, south to Pajaro, and several blocks east to the existing neighborhoods. State Route (SR) 152 runs through the approximate center of the plan area and operates along portions of Main Street and as a one-way couplet along E Lake Avenue and E Beach Street. Riverside Drive on the south end of the plan area is a part of SR 129. The location of the plan area is shown in Figure 2-1, and the plan area boundary is shown in Figure 2-2.

Figure 2-1 Project Vicinity Map



Regional, Site, Land Use and Zoning Maps
Fig 1 Regional Location

★ Project Location

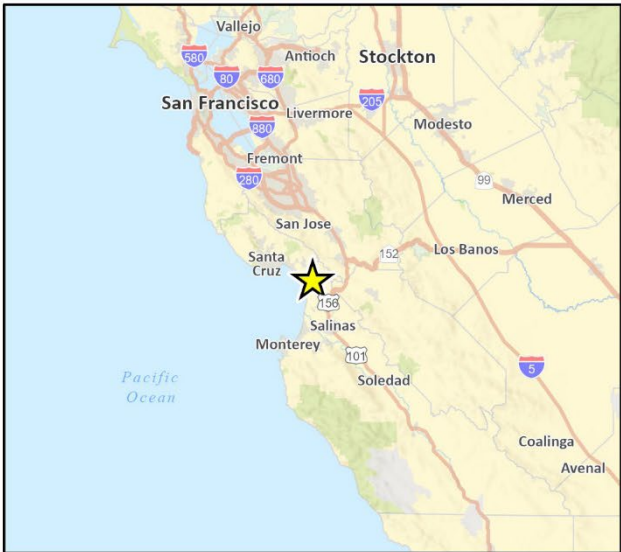
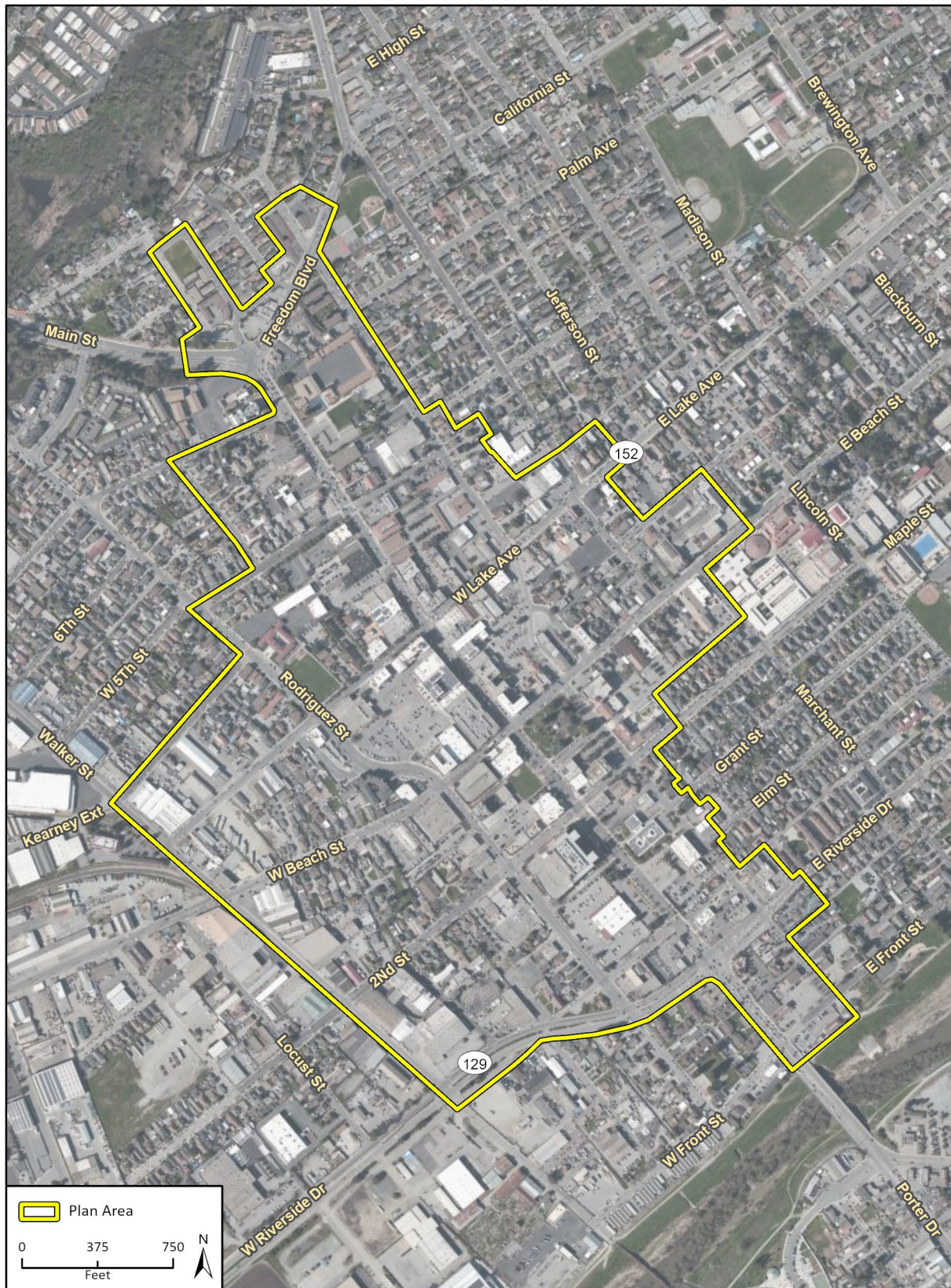


Figure 2-2 Plan Area Boundaries



2.4 Existing Setting and Surrounding Land Uses

The plan area includes a mix of uses which include retail, commercial, civic, religious, industrial, and residential. City Hall and the Police Station, Civic Plaza with Council Chambers, Library and County Courthouse, U.S. Post Office, and Cabrillo College are the major civic and institutional anchors in the plan area. The Watsonville City Plaza is an important Downtown public open space that supports civic and community activities. At the center of Downtown is Main Street, along which some historic and large mixed-use buildings are located with ground-floors consisting of local retail and services while the upper levels accommodate office and residential uses. Along Walker Street, single-story industrial buildings provide much of employment opportunities in the plan area.

The General Plan land use designations in the plan area include Central Commercial, General Commercial, Industrial, Public/Quasi-Public, Residential High Density, and Residential Low Density. The General Plan existing land use designations within the plan area are shown Figure 2-3.

The Watsonville Zoning Ordinance is found in Chapter 14-16 of the Watsonville Municipal Code (WMC). According to the City of Watsonville Zoning Map, the plan area includes Central Commercial, Central Commercial Core Area, General Industrial, Institutional, Multiple Residential-High Density, Neighborhood Commercial, Office, Public Facilities, Single Family Residential-Low Density, and Thoroughfare Commercial zoning districts. The existing zoning districts within the plan area are shown in Figure 2-4.

The existing roadway network in the Downtown area consists of a multitude of varying block lengths, several curvilinear streets, and some one-way streets. The Downtown roadway network accommodates local access through SR 152 and SR 129 while they also serve as conduits of regional travel which includes heavy truck use. Approximately 55.5 acres of Downtown Watsonville are dedicated to streets and right-of-way. The existing roadway network in the plan area is shown in Figure 2-5.

Figure 2-3 Existing General Plan Land Use Designations

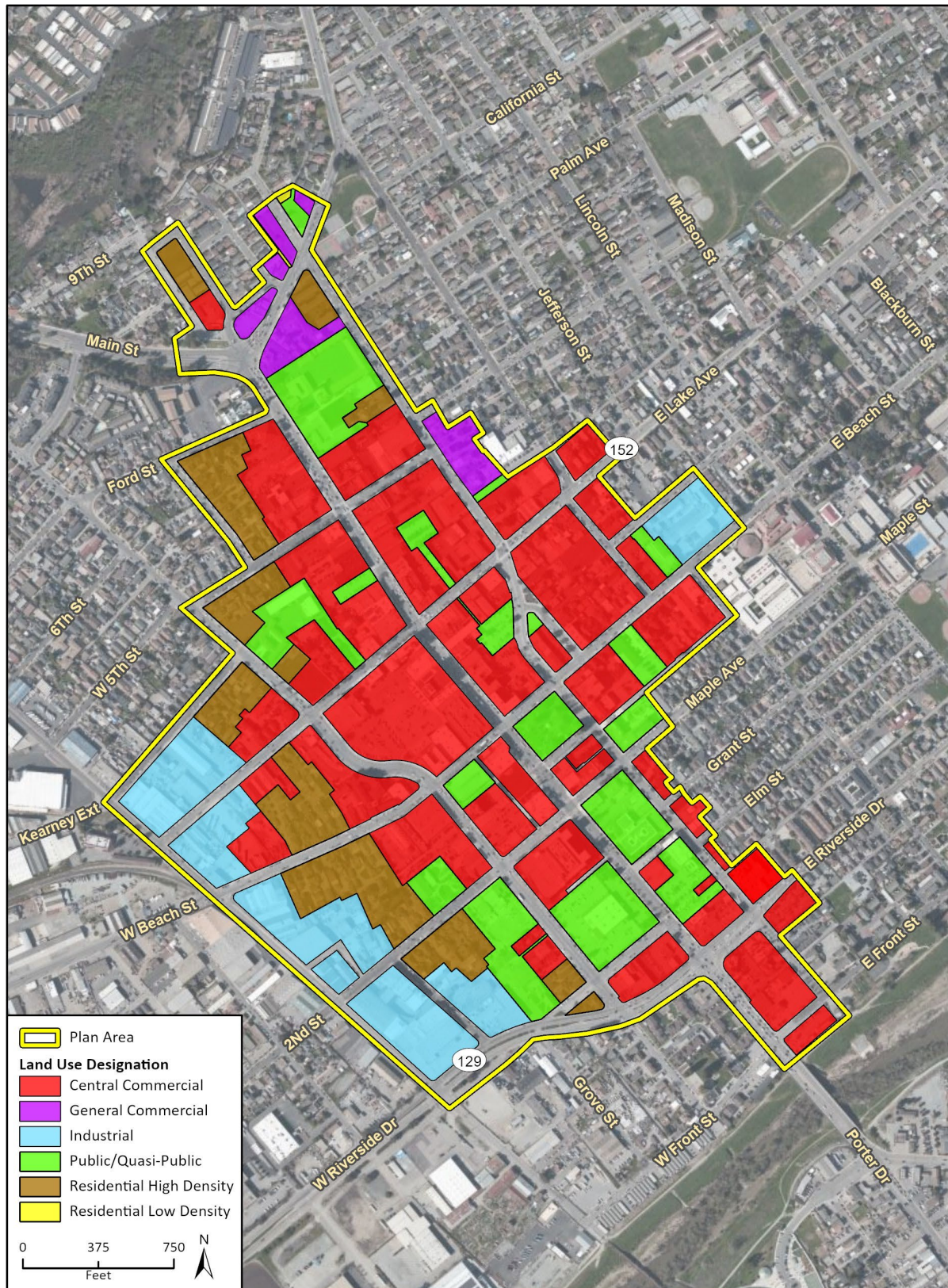
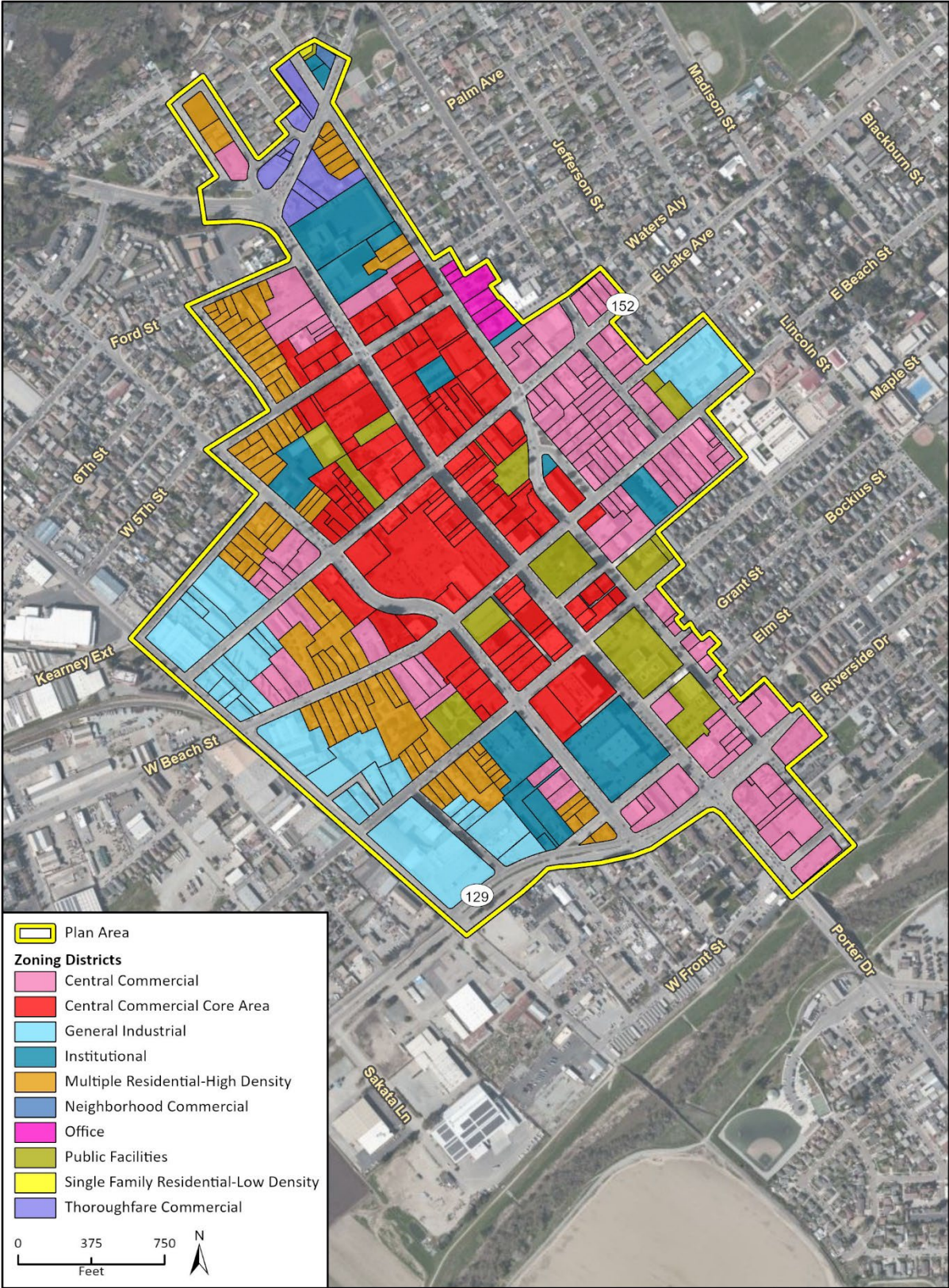


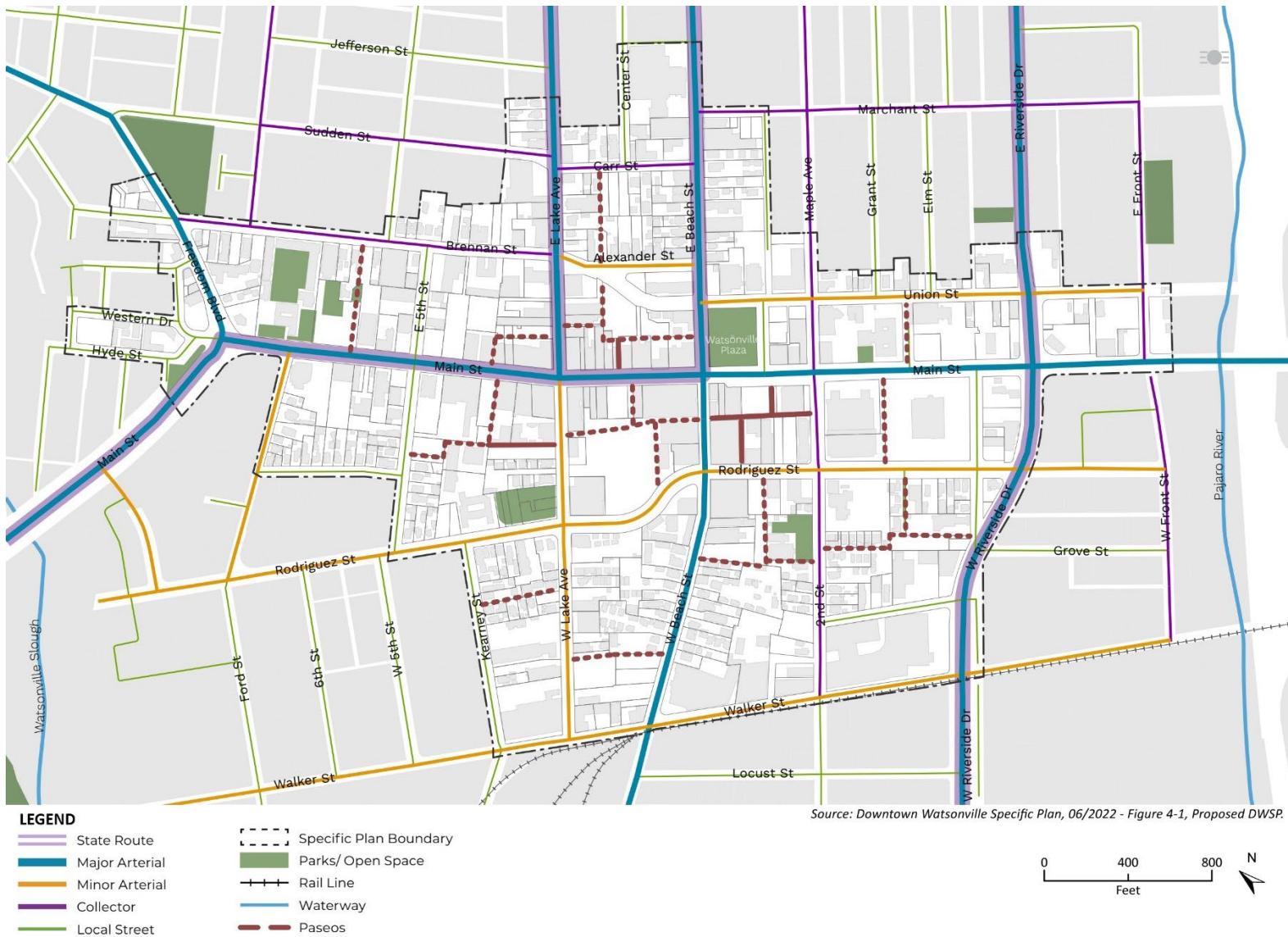
Figure 2-4 Existing Zoning Districts



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Regional, Site, Land Use and Zoning Maps
Fig 2 Project Location1

Figure 2-5 Existing Plan Area Roadway Network



2.5 Project Characteristics

2.5.1 DWSP Objectives

The DWSP would encourage higher-intensity, mixed-use neighborhoods by coalescing the City's Downtown with adjacent industrial and residential areas to create walkable and complete neighborhoods with a mix of retail, services, amenities, employment, and residential uses that would help to activate the Downtown area. The DWSP establishes the following guiding principles and objectives for Downtown Watsonville:

- Preserve key elements that make Downtown unique
- Establish a varied choice of uses and experiences for our diverse community
- Create diverse and inclusive housing opportunities
- Promote local economic prosperity
- Create a vibrant, safe, and active Downtown
- Foster a healthy, inclusive, and culturally connected community where all can thrive
- Re-imagine and innovate mobility options and connections
- Incorporate sustainable design elements to improve community health

2.5.2 DWSP Vision

The overarching vision of the DWSP supported by the goals and policies of the plan, which demonstrate the intentions for the physical development, redevelopment, conservation, and growth of the Downtown. The vision of the DWSP is to facilitate housing production and preservation; increase retail entertainment activity; encourage higher-density mixed-use residential projects; add visitor-oriented uses; support a greater range of civic and cultural activities; improve the safety and comfort of pedestrians; enhance bicycle infrastructure and connections; and target uses and activities that appeal to a wide range of Watsonville's residents and employees.

The urban design framework is based on major strategies identified by the community. Each of these strategies is intended to support the implementation of the DWSP's vision with the creation of new housing, jobs, and improvements to transportation and public spaces for residents and businesses in the Downtown. These major strategies guiding the urban design vision include:

- Retaining Downtown's charming historic architecture and character
- Building on and extending Downtown's walkable scale
- Activating Downtown with new uses, special events, and programming
- Providing improvements to the public realm, such as streetscape, public art, and murals
- Re-imagining the Main Street right-of-way to address traffic calming and walkability goals
- Providing more housing choices and maintain affordability
- Improving bicycle and pedestrian connectivity and safety
- Addressing traffic speed and congestion concerns

2.5.3 Proposed Zoning and Development Standards

The DWSP would establish new zones, overlays, and development standards and guidelines to guide development and to achieve the physical outcomes envisioned for the plan area. Chapter 6 of the DWSP outlines proposed development standards and guidelines for the plan area; unless otherwise specified in the DWSP, the zoning outlined in Chapter 6 would replace existing zoning for all property within the plan area. The DWSP would establish four zoning districts and three zoning overlays within the plan area, which are described below. Figure 2-6 shows the proposed zones and overlays within the plan area.

Zones

Downtown Core

Areas zoned as Downtown Core would be intended to be active, walkable environments, characterized by buildings of up to six stories. The Downtown Core would be the heart of the Downtown area, where the most active and intense development patterns and uses would be anticipated. Upper floors of development in the Downtown core could contain residential uses or office space, and buildings would be close to the sidewalk with little to no side setbacks.

Downtown Neighborhood

Downtown Neighborhood zones would be characterized by buildings smaller in scale than those in the Downtown Core zone and would generally include a similar mix of active and residential uses.

Downtown Industrial

Areas zoned as Downtown Industrial would allow existing industrial uses to continue to operate, while allowing for adaptive reuse of existing buildings and infill of mixed uses to occur over time. Pursuant to WMC Chapter 14-12, new industrial development would be subject to required findings of compatibility between adjacent uses related to traffic, noise, odors, visual nuisances, and other similar adverse effects.

Public Facilities

Development proposed for parcels zoned as Public Facilities would be subject to development and use standards established by WMC Section 14-16.800-803, which outlines permitted land uses and associated development requirements for Public Facilities zones.

Overlays

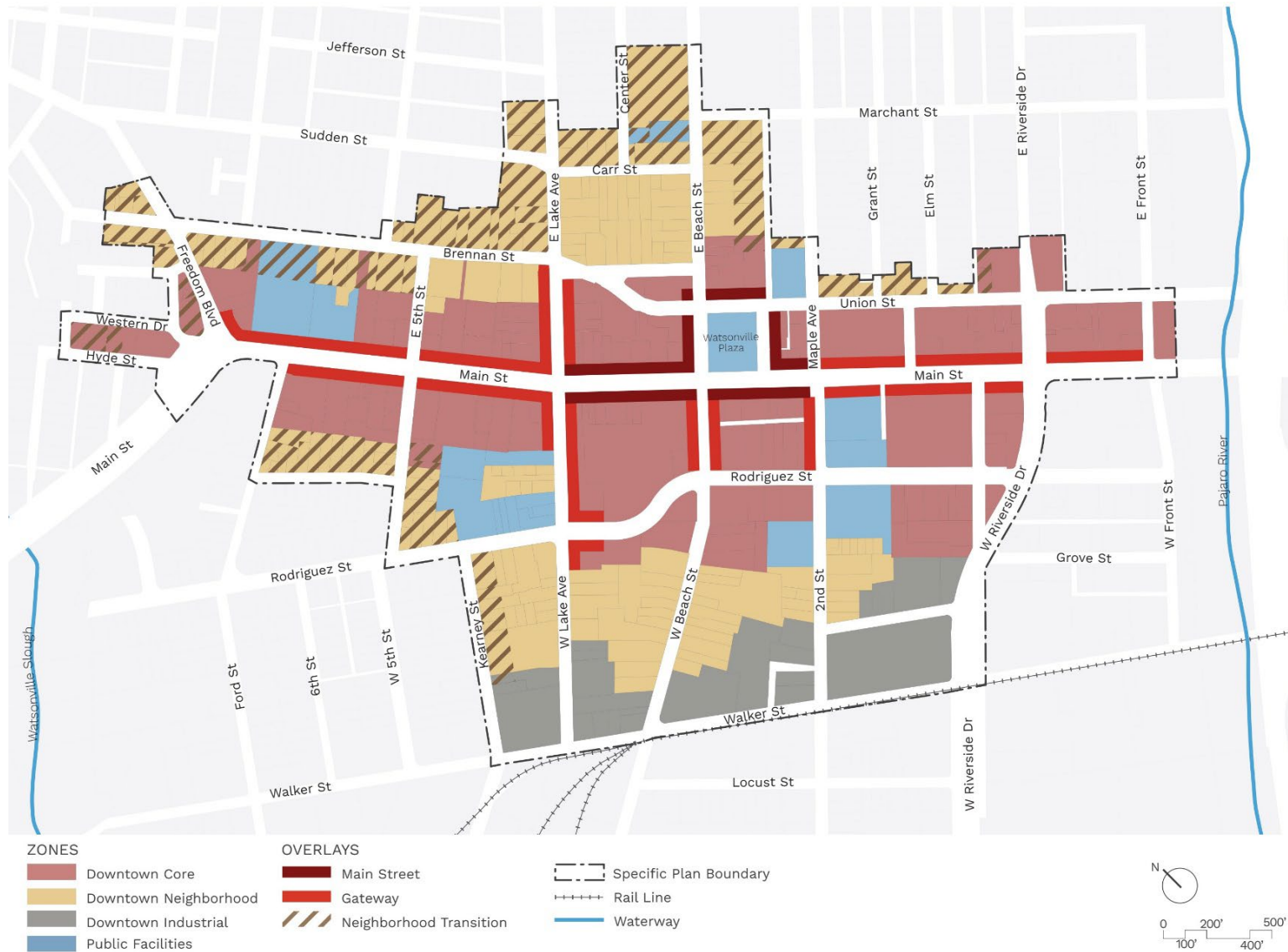
Main Street

The Main Street Overlay would be located in areas intended to have the most active ground floor uses. The Main Street Overlay would be contiguous so that the “main street” environment is concentrated, and not interrupted by areas containing less active environments.

Gateway

The Gateway Overlay would extend some of the characteristics of the Main Street Overlay further down Main Street and onto select cross-streets, with some flexibility.

Figure 2-6 Proposed Zones and Overlays



Neighborhood Transition

Development within the Neighborhood Transition Overlay would provide a transition between the commercial and mixed-use areas of Downtown and surrounding predominantly residential areas next to Downtown. For example, within the Neighborhood Transition Overlay, buildings height and massing would be sized down in scale compared to the Downtown Core, to be consistent with and provide a transition into the adjoining residential neighborhoods, which typically have smaller structures.

2.5.4 DWSP Buildout

The plan area is currently developed with primarily commercial buildings and established residential neighborhoods. Hence, future potential growth is likely to be directed to a limited number of vacant or under-utilized sites that could be redeveloped. As shown in Table 2-1, the Specific Plan envisions the maximum addition of approximately 231,151 square feet of commercial space, 376,827 square feet of industrial space, and 114,572 square feet of civic space to the plan area. In addition, the DWSP envisions the addition of up to 3,886 new residential units to the plan area over the next 25 years.

Table 2-1 Maximum Growth Projections for Specific Plan Area

Land Use	Residential (du)	Commercial (sf)	Industrial (sf)	Civic (sf)
Residential	3,886			
Dining Establishment		150,248	7,537	
Retail		57,788		
Office/Research Development		23,115	94,207	
Civic				114,572
Industrial			275,084	
Total	3,886	231,151	376,827	114,572

Note: 'du' equal dwelling unit and 'sf' equals square feet, and values presented in table are approximate

Source: City of Watsonville 2022

2.5.5 Downtown Transportation and Mobility

Chapter 4 of the DWSP contains the mobility and transportation vision and strategies for the plan area. The DWSP provides standards, guidelines, and design concepts to implement the following in the plan area:

- Install improvements to enhance pedestrian safety and access, bicycle connectivity, and revitalize downtown streetscape.
- Provide bicycle infrastructure that connects downtown to key locations and provides a low stress environment for bicycle riding.
- Provide widened and enhanced facilities for walking.
- Enhance parking, travel demand, and curb management to support an environmentally and fiscally sustainable downtown that increases quality of life in Watsonville.

The DWSP includes several roadway improvements to support multimodal travel, increase safety, and improve access to local amenities and businesses. The future improvements are designed to reduce potential conflict points between motorists, people who walk, and people who bike within the plan area. Key roadway improvements include:

- Reducing the number of travel lanes on Main Street from four to three with a center running left turn lane (or landscaped median) and one lane in each direction between Riverside Drive and Freedom Boulevards (aka “road diet”);
- Converting East Lake Avenue and East Beach Street, which currently operate as one-way couplets, into two-way streets;
- Squaring off the connection between Union Street and Alexander Street from East Lake Avenue to East Beach Street and vacating that portion of Union Street for private development; and
- Installing a roundabout at Freedom Boulevard and Main Street.

Further roadway improvements included in the DWSP are summarized in Table 2-2 and shown in Figure 2-7.

Table 2-2 Summary of Key Roadway Improvements in the Plan Area

Roadway Segment	Summary of Improvements
Main Street (E Lake Avenue to E. Beach Street)	<ul style="list-style-type: none">▪ Reduce travel lanes from four to three with a center running left turn lane and one lane in each direction.▪ Reallocate additional on-street right-of-way for parklets, sidewalk furniture, and widened sidewalks where feasible.▪ Maintain on-street parking.▪ Improve pedestrian crossings at intersections.▪ Provide medians at midblock locations where feasible.
Main Street (Central Avenue to 1st Street)	<ul style="list-style-type: none">▪ Maintain total right-of-way of 78 feet.▪ Require a public easement of 6 feet at the front property line to expand the sidewalk.▪ Reduce travel lanes from four to two with one vehicular travel lane in each direction and maintain or widen the existing landscaped median and/or center running left turn lanes where applicable.▪ Replace outside travel lanes with on-street parking and 2-foot buffers.▪ Consider expanding the pedestrian realm with bulb-outs and planters at intersections.
E Lake Avenue	<ul style="list-style-type: none">▪ Maintain existing right-of-way.▪ Maintain number of vehicular travel lanes.▪ Replace two westbound through lanes and dedicated right turn lane at intersections with one through lane in each direction and dedicated center turn lane at intersections or along the full length of commercial blocks as needed for local access.▪ Preserve on-street parking.▪ Center left turn lane may not be necessary through the length of the corridor and parking may be feasible where no left turn is needed.

Roadway Segment	Summary of Improvements
East Beach Street	<ul style="list-style-type: none"> ▪ Maintain existing right-of-way. ▪ Maintain number of vehicle travel lanes. ▪ Replace two eastbound through lanes with one through lane in each direction. ▪ Preserve on-street parking where feasible. ▪ Dedicate 7 feet of curb-to-curb right-of-way for parklets on north side or widened sidewalks on both sides.
Rodriguez Street	<ul style="list-style-type: none"> ▪ Maintain existing right-of-way and vehicle lane widths. ▪ Maintain only one vehicle travel lane in each direction. ▪ Increase northbound bicycle lane from 4 feet to 6 feet and maintain best practice bicycle lane widths of 6 feet minimum where feasible. ▪ Increase east and west side buffer widths and add vertical separation such as planters or flexible bollards where feasible.
Union Street	<ul style="list-style-type: none"> ▪ Maintain existing right-of-way. ▪ Maintain vehicle lane widths. ▪ Minimize impacts to on-street parking. ▪ Add Class III marked sharrows with signage. ▪ Integrate traffic calming measures such as chicanes or planter boxes.
Walker Street	<ul style="list-style-type: none"> ▪ Maintain existing curb-to-curb dimensions and one vehicle travel lane in each direction. ▪ Integrate flexible delineators within existing buffers. ▪ Maintain and/or add a clear path of travel for pedestrians and complete sidewalks where possible.
West 5 th Street	<ul style="list-style-type: none"> ▪ Maintain existing right-of-way and number of vehicle travel lanes, maintain 11-foot vehicle lanes. ▪ Reduce parking lane width by 1 foot, from 8 feet to 7 feet. ▪ Add Class III marked sharrows with signage. ▪ Provide a 2-foot buffer between the parking lane and Class III sharrows. ▪ Preserve residential on-street parking. ▪ Integrate traffic calming measures such as bulb-outs at intersections, and chicanes or planter boxes at midblock locations where feasible.
Source: City of Watsonville 2022	

Figure 2-7 DWSP Roadway Network Improvements



Chapter 4 of the DWSP also contains a complete list of bicycle improvements within the plan area, which are shown on Figure 2-8. Some examples of key bicycle improvements contained in the DWSP include:

- New signed bicycle route on Marchant Street between East Beach Street and the Levee Trail
- New signed bicycle route on Sudden Street between Freedom Boulevard and East Beach Street
- New signed bicycle route on Brennan Street/Union Street between Freedom Boulevard and the Levee Trail
- Improved wider bicycle lanes, with an enhanced buffer between adjacent vehicular travel lanes and the bicycle lane, on Rodriguez Street between West Lake Avenue and West Beach Street
- New bicycle lanes on Walker Street from West Riverside Drive to the Pajaro River
- New shared-use path from West Front Street along Rodriguez Street to the Levee Trail
- New signed bicycle route on Ford Street between Walker Street and Main Street
- New signed bicycle route on West 5th Street between Walker Street and Rodriguez Street
- New bicycle lanes on 5th Street between Rodriguez Street and Brennan Street
- New signed bicycle route on 2nd Street/Maple Avenue between Walker Street to Lincoln Street
- New signed bicycle route on East Front Street between Main Street and Marchant Street

Examples of pedestrian mobility standards provided in the DWSP include continuous sidewalks; design and maintenance of pedestrian facilities; complete streets; traffic calming measures; and tactile warning measures. Tactile warning measures enhance navigation for travelers with vision impairments.

2.6 Relationship to Other Plans

The DWSP considers existing and adopted plans, policies, and regulations at the city, regional, state, and federal levels. The DWSP's relationship to existing planning documents is outlined below.

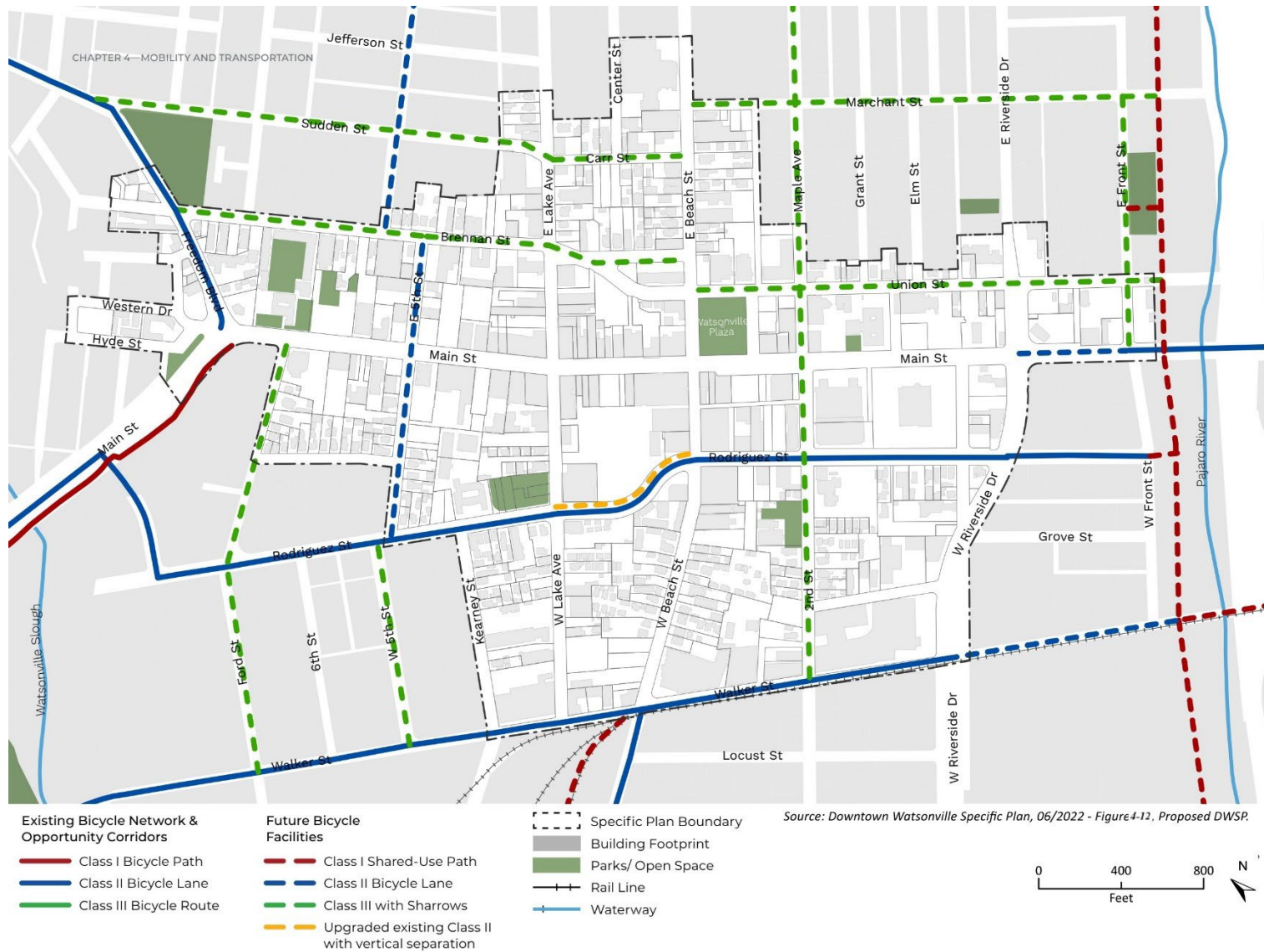
Watsonville 2005 General Plan

The City of Watsonville's 2005 General Plan, adopted in 1991, establishes land uses and policies for development in the City, including within the plan area. Pursuant to California General Plan law, specific plans must be internally consistent with the jurisdiction's existing general plan. The City's General Plan is being updated concurrently with the DWSP, and the General Plan shall be updated in instances where DWSP zoning is inconsistent with land uses established by the General Plan.

Watsonville General Plan Housing Element

The City's current Housing Element, prepared for the 5th planning cycle for the planning period of 2015 to 2023, is a required element of the City's General Plan and includes citywide strategies to address housing. The 6th cycle Housing Element, which would cover the planning period of 2023 to 2031, would plan for the City's Regional Housing Needs Allocation of 2,053 housing units. Some or all these units could be built in Downtown Watsonville.

Figure 2-8 DWSP Future Bicycle Network



Watsonville Zoning Ordinance

The land use and development standards established by the DWSP would supersede the land use and development standards established by the City's Zoning Ordinance for properties within the Downtown area. Regulations not addressed in the DWSP, including but not limited to standards for specific land uses, would still be regulated by the City's Zoning Ordinance.

Watsonville Complete Streets Plan

The Complete Streets Plan, adopted in 2019, provides a vision of a multi-modal, revitalized Downtown area that is accessible by users of all modes of transportation, including pedestrians, cyclists, transit riders, and motorists. The recommendations in the Complete Streets Plan would be superseded by provisions of the DWSP.

Watsonville Urban Greening Plan

The Urban Greening Plan, adopted in 2012, was developed to identify and facilitate the design of projects that address greenhouse gas (GHG) emissions or help residents adapt to challenges posed by climate change. Three of the Urban Greening Plan's six elements, including the Citywide Street Tree Program, Landscape Guidelines and Policy, and Green Roof Design Report & Criteria, are referenced in the DWSP.

Watsonville Climate Change and Adaptation Plan

The Watsonville Climate Action and Adaptation Plan was adopted in 2021 to reduce the community's GHG emissions below certain targets. As the transportation sector contributes the greatest amount of GHG emissions, the Climate Action and Adaptation Plan calls for implementing a range of strategies to reduce the number and length of vehicle trips, including facilitating smart growth, increasing multimodal transportation facilities, managing better available parking, and supporting passenger rail service. The DWSP would support these strategies through fostering high-density, infill development near transit, identifying pedestrian and bicycle enhancements, and revising parking and other development standards to reduce the transportation sector's GHG contribution by reducing single-occupant vehicle driving and encouraging alternative modes of transportation.

2.7 Project Related Approvals, Permits, and Discretionary Actions

Because the Specific Plan is a conceptual vision for the downtown area and not a formal site plan or construction application, no permits are needed for its adoption. However, the City of Watsonville City Council must formally certify the EIR and adopt the Specific Plan, and then implement the vision and changes identified in the Specific Plan. Implementation of the Specific Plan would also require an amendment to the City's General Plan.

Individual projects pursuant to the DWSP would require permits and approvals such as, but not limited to, City of Watsonville demolition and building permits and design review. Future approvals from the City of Watsonville may require additional environmental review with the City of Watsonville as the lead agency.

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3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

Watsonville is in the southern area of Santa Cruz County, approximately 14 miles southeast of the city of Santa Cruz, 16 miles north of the city of Salinas, and 22 miles northeast of the city of Monterey. The City is bordered by the unincorporated communities of Freedom to the north, Interlaken to the east, and Pajaro to the south. The Monterey Bay/Pacific Ocean is approximately three miles west of the City.

3.2 Project Site Setting

The DWSP plan area encompasses approximately 195.5 acres within Downtown Watsonville, located in the southeastern portion of the City. Downtown is centered on Main Street and extends west to the edge of existing neighborhoods and the industrial district, south to Pajaro, and several blocks east to the existing neighborhoods. Downtown Watsonville consists of a mix of old and newer buildings styles and architecture, sidewalks, pocket parks, and roadways. The streetscape throughout the plan area varies in terms of design features, amenities, and sidewalk width and condition as it transitions from the Downtown core to the north and west into residential and commercial shopping centers, and to the east as it transitions to industrial and agricultural uses. Most of the plan area is developed with small sections of non-native vegetation and bare ground. The plan area does not contain natural or rural areas.

The plan area includes a mix of uses which include retail, commercial, civic, religious, industrial, and residential. City Hall and the Police Station, Civic Plaza with Council Chambers, Library and County Courthouse, U.S. Post Office, and Cabrillo College are the major civic and institutional anchors in the Downtown. The historic City Plaza is an important Downtown public open space that supports civic and community activities. At the center of Downtown is Main Street, along which many historic and large mixed-use buildings are located with ground-floors consisting of local retail and services while the upper levels accommodate office and residential uses. Along Walker Street, single-story industrial buildings provide employment.

The existing roadway network in the downtown area consists of a multitude of varying block lengths, several curvilinear streets, and some one-way streets. The downtown roadway network accommodates local access through State Route (SR) 152 and SR 129 while they also serve as conduits of regional travel which includes heavy truck use. SR 152 runs through the center of the plan area and operates along portions of Main Street and as a one-way couplet along E Lake Avenue and E Beach Street. Main Street is a four-lane landscaped gateway roadway that provides a variety of views of developed commercial shopping centers, Ramsay Park, historic buildings, the Watsonville Plaza, and the Pajaro River. Riverside Drive on the south end of the plan area is a part of SR 129. Riverside Drive from the Highway 1 interchange eastward provides travelers with a cross-sectional view of Watsonville. The landscaped portion of this entry into the plan area continues

across the railroad tracks to Main Street, passing through older residential areas and ending Salsipuedes Creek. The plan area is shown in Section 2, *Project Description*.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in Watsonville are listed in Table 3-1.

Table 3-1 Cumulative Projects List

Project No.	Project Name	Land Use and/or Brief Description
Under Review		
1	950 West Beach Street	Industrial
2	200 Manabe Ow Road Distribution Facility	Industrial with Office
3	100 Manabe Ow Road Industrial Building	Industrial
4	Crockers Lockers at 750 Nielson Street	Self-Storage
5	Ramsay Park Renaissance Project	Park
6	Freedom Campus Master Plan (in Watsonville but under review by County of Santa Cruz)	Medical/Civic
Approved Projects		
7	1 Western Drive	Retail/Commercial
8	Triplex	Residential
9	230 Riverside Drive	Residential
10	65 Hangar Way #3	Retail/Commercial
11	21 Townhouse Project at 547 Airport Boulevard	Residential
12	Biodiesel Facility Modification at 860 West Beach Street	Industrial
13	Pajaro Valley High School Auditorium Project at 500 Harkins Slough Road	Educational
14	The Residence	Four-Story Mixed-Use Building
Under Construction		
15	Eden Housing Project at 1482 Freedom Boulevard	Residential
16	49 Townhouse Project at 221 Airport Boulevard	Residential
17	1715 West Beach Street	Retail/Commercial
18	Evans Circle	Residential

Project No.	Project Name	Land Use and/or Brief Description
19	Hillcrest Estates	Residential
20	Sunshine Gardens	Residential
21	Commercial Redevelopment Project at 975 Main Street	Retail/Commercial
22	Miles Lane Project	Residential/Medical
¹ Cumulative project details were sourced from the City of Watsonville's <i>Community Development and Planning Viewer</i> (City of Watsonville 2023).		

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the proposed DWSP for the issue areas that were identified through the scoping process and Initial Study as having the potential to experience significant effects. A “significant effect,” as defined by the *CEQA Guidelines* §15382:

means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which includes the existing regulatory setting. The existing setting is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures, if required, and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure(s) for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Aesthetics

This section describes the aesthetic and visual resources conditions within the plan area and vicinity and assesses the potential aesthetic impacts that may result with implementation of the proposed DWSP.

4.1.1 Setting

Regional Setting

The City is located in the Pajaro Valley along the southern limits of Santa Cruz County. The City is surrounded by agricultural land and rangeland, which is offset by the ridgeline of the Santa Cruz Mountains to the north and east. The wooded nature of these mountains provides both color and textural contrast to the agricultural land and urban development in the valley below. The agricultural land and undeveloped ridgeline encircling Watsonville add a distinct rural character to the urban viewsheds in the City. The City's western edge is defined by Highway 1 and agricultural land that extends to the Monterey Bay. Landscape features within and surrounding the City are diverse and exhibit substantial visual variety. Representative visual features include the overall urban landscape, major arterial thoroughfares, scenic corridors, agricultural lands, open space, and ridgelines. The plan area is visible from areas outside of Watsonville that some people might consider scenic corridors, such as the "Sand Point Overlook" in or near the Forest of Nisene Marks, approximately 12 miles northwest of the plan area. However, characteristics of individual buildings or roadways are not visible due to the distance.

Plan Area and Surrounding Area Setting

Downtown Watsonville, which comprises the plan area, is a mix of old and newer buildings styles and architecture, sidewalks, pocket parks, and roadways (Watsonville 2022). The Main Street corridor, generally considered the core of downtown, is characterized by a mix of single-story retail buildings and multi-story buildings up to 4 or 5 stories with ground-floor retail and residences or offices on upper floors. Many of the buildings on Main Street have historic architecture, such as Renaissance Revival and Spanish Colonial architectural styles, however not all buildings on Main Street are officially designated as historic buildings or properties. As discussed in Section 4.4, *Cultural Resources*, much of Main Street was established in the late 1800s. Other parts of the plan area contain similar low-rise buildings, such as industrial warehouse buildings along Walker Street. Single-family homes in the plan area are generally one to two stories in height and cover much of the lot or property they are located on. Many of the residential neighborhoods in plan area were also established in the late 1800s, and retain some of the original architecture, in Queen Anne Victorian architectural styles which include decorative eaves and awnings and trellis trim.

The streetscape throughout the plan area varies in terms of design features, amenities, and sidewalk width and condition as it transitions from the Downtown core to the north and west into residential and commercial shopping centers, and to the east as it transitions to industrial and agricultural uses. Street trees and landscaping add to the aesthetic character of the plan area, while overhead power lines detract from the visual quality. Pedestrian activity is generally low, although pedestrian activity can be moderate in select areas of the plan area, such as along Main Street in the downtown core. Downtown events, such as the farmers market, also increase pedestrian activity in the plan area.

Scenic Roadways

Scenic routes and roadways provide access to scenic resources, which include the broad sweep of the Pajaro Valley, the hills and mountains which frame the valley floor, coastal lands, and the urban skyline. According to the Urban Design and Scenic Resources Element of the Watsonville 2005 General Plan, each scenic route must satisfy a minimum of four of the following criteria: 1) presence of views and vistas; 2) absence of clutter; 3) presence of interesting features; 4) presence of significant vegetation; 5) visual variety; and 6) service as a gateway. Roadways or segments of roadway that occur within the plan area and are classified as scenic routes in the General Plan include the following:

- **E Lake Avenue - from State Route (SR) 152 from Main Street to Carlton.** This stretch of SR 152 provides views of the surrounding hills, mountains, and passes by several notable historic structures.
- **East Beach Street – Main Street to Beck Street.** East Beach Street affords views of historic structures and areas, including Watsonville Plaza and the central commercial center, Watsonville High School, and three designated historic houses.
- **Main Street – Highway 1 to the Pajaro River.** Main Street is a four-lane landscaped gateway roadway that provides a variety of views of developed commercial shopping centers, Ramsay Park, historic buildings, the Watsonville Plaza, and the Pajaro River.
- **Riverside Drive (SR 129) – Highway 1 to Salsipuedes Creek.** Riverside Drive from the Highway 1 interchange eastward provides travelers with a cross-sectional view of Watsonville. Riverside Drive emerges from the fields adjacent to Highway 1 and the Pajaro River. The roadway then passes the food processing warehouses which have been the backbone of the City. The landscaped portion of this entry into the plan area continues across the railroad tracks to Main Street, passing through older residential areas and ending (or beginning) Salsipuedes Creek.

The roadways listed above are classified as scenic routes by the City in its 2005 General Plan. However, these routes are not designated state scenic highways. There are no designated state scenic highways within the plan area (Caltrans 2022).

Light and Glare

Sources of nighttime lighting in the plan area include lighting of signs, buildings, walkways, parking lots, and parking structures, as well as indoor lighting visible through windows. Lighting conditions vary throughout the plan area from heavily lit developed areas to low-intensity residential night lighting.

4.1.2 Regulatory Setting

a. State Regulations

State Designated Scenic Routes

The California Scenic Highway Program was created by the Legislature in 1963 with the purpose to preserve and protect scenic highway corridors from change, which would diminish the aesthetic value of lands adjacent to highways. The California Department of Transportation (Caltrans) manages the California Scenic Highway Program, provides guidance, and assists local government agencies, community organizations, and citizens with the process to officially designate scenic

highways. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The California Scenic Highway Program includes a list of highways that are either eligible for designation as scenic highways or have been so designated. The highways are identified in Section 263 of the Streets and Highways Code.

State highways nominated for scenic designation must first be on the statutory list of highways eligible for scenic designation in the State Scenic Highway System. A process for adding eligible highways to the statutory list is described in *Section III: Obtaining Eligibility* of the Caltrans' *Scenic Highway Guidelines*. Scenic highway nominations are evaluated using the following criteria:

- The State or county highway consists of a scenic corridor that is comprised of a memorable landscape that showcases the natural scenic beauty or agriculture of California.
- Existing visual intrusions do not significantly impact the scenic corridor.
- Demonstration of strong local support for the proposed scenic highway designation.
- The length of the proposed scenic highways is not less than a mile and is not segmented.

The status of a State scenic highway changes from eligible to officially designated when the local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a Scenic Highway. According to the Caltrans California Scenic Highway Program, Highway 1 and SR 152, which traverse the City, are eligible for the official State Scenic Highway designation. However, there are no officially designated State scenic highways in Watsonville (Caltrans 2022).

b. Local Regulations

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. For example, Chapter 11 of Title 7, *Street Trees*, prevents trees from being planted along streets without a permit, and Chapter 13 of Title 7, *Preservation of Historical Trees*, states the City Council, by ordinance, may designate an individual tree or other feature, or an integrated group of trees and features on a single lot or site, having a special character or special historical or aesthetic interest or value as a designated tree and shall further describe a site sufficient for each designated tree to maintain its growth and preservation.

City of Watsonville 2005 General Plan

The preservation of the City's rich historical and cultural resources, combined with the preservation of the natural beauty and rural backdrop of the Pajaro Valley, are the central issues and purposes of the Urban Design and Scenic Resources Element of the Watsonville 2005 General Plan. According to the General Plan, in reviewing new projects, the City considers the following design review guidelines:

- **Site Planning.** Guidelines emphasize suitability of the site for its proposed use and proposed building, efficiency of circulation and parking design, and building placement and orientation, particularly with regard to environmentally sensitive areas.
- **Building Design.** Guidelines emphasize harmony with surrounding neighborhood, including materials, texture, color, height, and architectural detail.

- **Landscaping.** Planting materials, lighting, fencing, and signs are considered by the City in order to ensure a safe and visually pleasing project.

In addition to considerations related to the built environment, the scenic quality of City is also enhanced through the preservation of significant natural features, which include wetlands, sloughs, rivers, lakes, hillsides, and stands of vegetation. These resources are important not only for their visual contribution to the City, but also for their passive recreational and educational opportunities.

The following goals, policies, and implementation measures within the Urban Design and Scenic Resources Element are applicable to the aesthetics and visual character related to the proposed project within the City.

- **Goal 5.1 Visual Resources:** Preserve and enhance the built and natural visual resources within Watsonville.
- **Goal 5.2 Community Appearance:** Blend new development and recognized values of community appearance and scenic qualities, and ensure that new development enhances, rather than detracts from its surroundings.
- **Goal 5.5 Viewscape:** Preserve scenic rural qualities surrounding the urbanized portions of the planning area.
- **Goal 5.8 Urban Beautification:** Support public and private urban beautification activities and promote pride in community appearance.
- **Goal 5.9 Scenic Corridors:** Protect and enhance views to and from the scenic streets and highways 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.
 - **Implementation Measure 5.A.2, Design Information Requirements:** Application requirements for projects to meet the design review criteria shall include a preliminary site plan, exterior elevations, vehicular and pedestrian circulation, grading, parking plans, colors, sign locations and elevations, fence height and design, and a landscape plan.
 - **Implementation Measure 5.A.4, Development Standards:** In addition to the design review guidelines, the City shall use the adopted standards for multiple family residential developments to ensure that medium- and high-density development is designed so as to enhance rather than detract from the urban environment.
 - **Implementation Measure 5.A.5, Scenic Resources:** The City shall, through its design review process, consider the impact of the development on both the visual quality of the build environment and the scenic quality of natural features including sloughs, wetland, rivers, lakes, hillsides and stands of vegetation.
 - **Policy 5.B Design Consistency:** The City shall review new development proposals to encourage high standards or urban design and to ensure that elements of architectural design and site orientation do not degrade or conflict with the appearance of existing structures.

- **Implementation Measure 5.B.2, Neighborhood Identity:** New development in established neighborhoods shall be encouraged to utilize the surrounding architectural themes and/or materials to promote neighborhood harmony and identity.
- **Implementation Measure 5.B.3, Enhancement:** The City shall utilize the development standards, zoning ordinance regulations for each district, and the design review guidelines to ensure that new development is an asset to the existing neighborhood and community with regard to parking, landscaping, open space, and project design.
- **Policy 5.F Design Factors:** The design review process shall combine elements of aesthetics with considerations for project efficiency.
 - **Implementation Measure 5.F.1, Project Appearance Factors:** Considerations for project appearance shall include, but are not limited to, the following:
 - a. Compatibility with adjacent architectural styles;
 - b. Respect for design features of the original architectural style for building renovation projects;
 - c. Avoids of monotonous expanses of blank walls, including fire walls;
 - d. Orientation of the project with respect to natural topography, the retention of trees, and significant natural habitat;
 - e. Placement and screening of trash containers from view and adequacy of the type and number of trash containers provided on site;
 - f. Undergrounding of utility lines and meter boxes and screening of transformers;
 - g. Visual interest of exterior finishes and colors;
 - h. Discrete placement of microwave dish and satellite antennas; and
 - i. Placement and design of external lighting fixtures to blend with the architectural style, provide safe areas, and avoid offsite glare.
- **Policy 5.J Scenic Natural Resources:** The City shall conserve and enhance natural resources that contribute to visual, recreational, and educational aesthetics of Watsonville. Such resources include: wetlands, sloughs, rivers, lakes, hillsides, and stands of vegetation.
 - **Implementation Measure 5.J.2, Compatibility:** Whenever a new development is proposed next to a natural scenic resource, the design review process will be used to maintain or create visual harmony between new and old structures and their natural setting.

City of Watsonville Livable Community Residential Design Guidelines

In 2001, the Watsonville City Council adopted the Watsonville Livable Community Residential Design Guidelines (Guidelines) with the objective to develop more housing in a way that conserves the desirable characteristics of established neighborhoods, while improving new and evolving neighborhoods. Based on seven neighborhood and architectural design principles, the Guidelines provide a framework of neighborhood and design criteria for shaping residential development in the City. The Guidelines indicate that new housing should 1) connect to the community, 2) use block patterns that are similar to Watsonville's traditional neighborhoods, 3) avoid flood and wetland areas, and 4) fully integrate parks and community facilities where appropriate.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

The DWSP is a planning document to guide development; it does not propose specific development projects. Therefore, the following discussions provide program-level review of the potential aesthetic impacts that could result from implementation of the DWSP.

The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. Different viewers react to viewsheds and aesthetic conditions differently. This discussion evaluates the existing visual environment against the anticipated level of development with implementation of the proposed project. The discussion below, therefore, emphasizes change in aesthetic character and views, rather than placing value on the aesthetic quality of a particular condition.

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant environmental effects on the aesthetic and visual character of the area if it would:

- 1) Have a substantial adverse effect on a scenic vista;
- 2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- 3) Conflict with applicable zoning and other regulations governing scenic quality;
- 4) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

The Initial Study (Appendix A) found impacts related to substantial damage to scenic resources, within a state scenic highway as less than significant because there are no officially designated state scenic highways within or near the plan area. Therefore, Threshold 2 is not studied further in this section.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?
--

Impact AES-1 IMPLEMENTATION OF THE DWSP WOULD HAVE NO SUBSTANTIAL ADVERSE EFFECTS ON SCENIC VISTAS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The plan area consists of downtown Watsonville, which is characterized by urban development and is relatively flat. There are no scenic vistas, such a mountain overlooks or other point providing panoramic views and vistas. However, as described in *Viewing Corridors and Scenic Roadways*, four scenic routes are present within the plan area (Watsonville 2005). The DWSP envisions these roadways or the buildings and landscape visible from them, or both. For example, Main Street is classified as a scenic route by the City and the DWSP envisions numerous changes on and along Main Street would alter views. These modifications to the roadway would change views, generally making the view more appealing with wider pedestrian sidewalks and landscaping. Furthermore, Chapter 6 of the DWSP contains standards to ensure that new or redeveloped buildings on scenic roads in the plan area would be consistent with the views that currently are provided. Additionally, the development envisioned in the DWSP would be infill within the downtown area, where distant views are already obstructed by the many buildings present in the plan area. The additional building

height envisioned in the DWSP would therefore not substantially obstruct views since the entire plan area is already developed with structures exceeding eye level of viewers.

Because the plan area consists of a large, urbanized area characterized by buildings and roadways, it could be visible from areas outside of Watsonville that some people might consider scenic vistas. An example could be the “Sand Point Overlook” in or near the Forest of Nisene Marks, approximately 12 miles northwest of the plan area. However, because the DWSP contains the design standards described above, changes would be subtle and negligible from these distant vistas. Accordingly, the impacts of the DWSP on scenic vistas would be less than significant.

Mitigation Measures

No mitigation measures are required

Significance after Mitigation

Impacts would be less than significant without mitigation.

Threshold 3: Would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-2 IMPLEMENTATION OF THE DWSP WOULD ESTABLISH NEW ZONING AND DESIGN STANDARDS THAT PRESERVE AND IMPROVE SCENIC QUALITY IN THE PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The plan area is an urbanized area because it consists of existing downtown Watsonville. As discussed in Section 2, *Project Description*, the DWSP would implement new zoning, overlays, and development standards for the plan area to meet the following key objectives:

- Preserve key elements that make Downtown unique
- Establish a varied choice of uses and experiences for our diverse community
- Create housing opportunities for all
- Promote local economic prosperity
- Create a vibrant, safe, and active Downtown
- Foster a healthy, inclusive, and culturally connected community where all can thrive
- Re-imagine and innovate mobility options and connections
- Incorporate sustainable design elements to improve community health

As stated in Section 2, *Project Description*, and described in the impact analysis for impact AES-1, Chapter 6 of the DWSP outlines proposed development standards and guidelines for Downtown Watsonville; unless otherwise specified in the DWSP. The DWSP would establish four zoning districts and three zoning overlays within the Downtown area (see Section 2, *Project Description*, for location of proposed zoning).

To preserve key elements that make Downtown unique and establish a varied choice of uses and experiences for the diverse community, plans for development with the plan area would be subject to review for consistency with the DWSP including new zoning, overlays, and development standards. Thus, compliance with the design guidelines in the DWSP would be in keeping with the aesthetic standards for future development in the plan area.

The City would review and approve new development for compliance with development standards, sign regulations, and urban design guidelines in the DWSP, prior to the approval of individual building permits. Thus, with compliance to the DWSP proposed development standards and guidelines for plan area, development would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts of the DWSP would be less than significant.

Mitigation Measures

No mitigation measures are required

Significance after Mitigation

Impacts would be less than significant without mitigation.

Threshold 4: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-3 IMPLEMENTATION OF THE DWSP WOULD CREATE NEW SOURCES OF LIGHT AND GLARE, BUT NEW LIGHT AND GLARE WOULD NOT BE SUBSTANTIAL. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Implementation of the DWSP would result in the addition of new nighttime light and daytime glare to the plan area including external housing lights, streetlights, parking lot lights, security lights, vehicular headlights, internal building lights that spill through windows and doors, and reflective building surfaces and windows that create glare.

Future development pursuant to the DWSP would be subject to the Watsonville Municipal Code requirements such as Chapter 14-16, *District Regulation*, which outlines permitted uses and other requirements including lighting requirements for the various zoning districts within Watsonville. Additionally, compliance with lighting guidelines in the DWSP and the City's development regulations regarding glare would prevent the creation of significant adverse light and glare impacts. For example, Chapter 6 of the DWSP requires that site lighting be shielded by permanent attachments to light fixtures so that light sources are not visible from a public way and to prevent off-site glare. Chapter 6 of the DWSP also contains requirements that would restrict how bright or intense light fixtures could be depending on whether the fixture is used for residential structures or commercial/industrial structures. Chapter 6 provides standards for buildings, such as arcades, which are extensions of upper floors of a building, and these would shade bottom floors which typically contain larger panels of glass for windows. This would also reduce glare from reflective surfaces, for example. Therefore, the project would not create a new source of substantial glare that would adversely affect daytime or nighttime views in the area. Light and glare impacts of the DWSP would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance after Mitigation

Impacts would be less than significant without mitigation.

c. Cumulative Impacts Assessment

The cumulative impacts assessment area for aesthetics is the area within the limits of the City of Watsonville. The city limits are an appropriate boundary for the cumulative impacts assessment area because the cumulative projects in Table 3-1 and there is substantial open space between Watsonville and surrounding communities.

The reasonably foreseeable future projects in Table 3-1 would result in continued urbanization of Watsonville. For example, the foreseeable Hillcrest Subdivision project would add residential buildings and internal circulation roads on a property that is not currently developed with these uses. The reasonably foreseeable Freedom Campus Master Plan project would result in densification of property along Freedom Boulevard, proximate to the DWSP plan area. Reasonably foreseeable future projects would be required to comply with applicable zoning code, including zoning code pertaining to design styles and aesthetics. This would prevent significant cumulative impacts related to conflicts with applicable zoning and other regulations governing scenic quality. However, cumulative development may, over time, alter the visual character of the City with further urban development. This would be a potentially significant cumulative impact on aesthetic resources due to changing the visual quality of the City's viewing corridors. However, with compliance to existing zoning and development standards and guidelines, cumulative development would not conflict with applicable zoning and other regulations governing scenic quality.

As discussed in the impact analysis above, the proposed DWSP would not have a significant negative impact on the aesthetics of the plan area or its surroundings. The plan area does not contain natural or rural areas because it consists of the urbanized downtown area of Watsonville. The DWSP focuses on infill development which would reduce demolition of existing architecture while adding cohesive facades, streetscapes, and public art, among other visual enhancements and standards. Infill development could increase the potential for demolishing existing historic structures, however, future development would also be subject to review for consistency with new zoning, overlays, and development standards which would preserve key elements that make Downtown unique. It would also prevent substantial increases in new sources of light pollution or glare in Watsonville, as described in Impact AES-3, above. Thus, buildout of the DWSP would not result in a cumulatively considerable contribution to significant cumulative aesthetic impacts.

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4.2 Air Quality

This section assesses potential impacts of implementation of the DWSP to air quality, including short-term construction emissions, long-term operational emissions, and potential impacts on sensitive receptors in and near the plan area.

4.2.1 Setting

a. Climate and Topography

The DWSP plan area is located in the North Central Coast Air Basin (Basin). The Basin covers an area of 5,159 square miles, including the counties of Santa Cruz, San Benito, and Monterey. The semi-permanent high pressure cell in the eastern Pacific is the basic controlling factor in the climate of the Basin. In the summer, the high pressure cell is dominant and causes persistent west and northwest winds over the entire California coast. Air descends in the Pacific High forming a stable temperature inversion of hot air over a cool coastal layer of air. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. The warmer air loft acts as a lid to inhibit vertical air movement (MBARD, 2008a).

The generally northwest-southeast orientation of mountainous ridges tends to restrict and channel the summer onshore air currents. Surface heating in the interior portion of the Salinas and San Benito valleys creates a weak low pressure which intensifies the onshore air flow during the afternoon and evening. In the fall, the surface winds become weak, and the marine layer grows shallow, dissipating altogether on some days. The air flow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the Pacific High-pressure cell, which allows pollutants to build up over a period of a few days. It is most often during this season that the north or east winds develop to transport pollutants from either the San Francisco Bay area or the Central Valley into the Basin (MBARD, 2008a).

During the winter, the Pacific High migrates southward and has less influence on the air basin. Air frequently flows in a southeasterly direction out of the Salinas and San Benito valleys, especially during night and morning hours. Northwest winds are nevertheless still dominant in winter, but easterly flow is more frequent. The general absence of deep, persistent inversions and the occasional storm systems usually result in good air quality for the Basin as a whole in winter and early spring (MBARD, 2008a).

Climate, or the average weather condition, affects air quality in several ways. Wind patterns can remove or add air pollutants emitted by stationary or mobile sources. Inversion, a condition where warm air traps cooler air underneath it, can hold pollutants near the ground by limiting upward mixing (dilution). Topography also affects the local climate, as valleys often trap emissions by limiting lateral dispersal.

Winds originating in the San Francisco Bay Area Air Basin to the north often transport pollutants into the Basin, where surface winds move the pollutants to the eastern part of the Basin. For instance, the transport of ozone precursor emissions from San Francisco Bay Area Air Basin through the Santa Clara Valley/San Benito River Valley plays a dominant role in ozone concentrations measured in San Benito County (MBARD, 2013). The transport of pollutants can often cause exceedances of air quality standards in the Basin.

The plan area is located in the northern portion of the Basin. Air pollutant emissions within the Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on- or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when high winds suspend fine dust particles.

b. Air Pollution

The federal and state Clean Air Acts regulate the emission of airborne pollutants from various mobile and stationary sources. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent in the California Environmental Protection Agency (CalEPA). These agencies have established ambient air quality standards for the protection of public health. Local air quality management control and planning is provided through regional air pollution control districts established by CARB for the 14 statewide air basins. CARB is responsible for control of mobile emission sources, while the local air pollution control districts are responsible for control of stationary sources and enforcing regulations. Watsonville is located within the Basin, which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD).

Federal and state standards have been established for six criteria pollutants, including ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulates less than 10 and 2.5 microns in diameter (PM₁₀ and PM_{2.5}), and lead (see Table 4.2-1). California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The local air quality management agency is required to monitor air pollutant levels to assure that air quality standards are met and, in the event they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “nonattainment.”

Table 4.2-1 Current Federal and State Ambient Air Quality Standards

Pollutant	Federal Standard	California Standard
Ozone	0.07 ppm (8-hr average)	0.09 ppm (1-hr average) 0.07 ppm (8-hr average)
Carbon Monoxide (CO)	35 ppm (1-hr average) 9 ppm (8-hr average)	20 ppm (1-hr average) 9 ppm (8-hr average)
Nitrogen Dioxide (NO _x)	0.10 ppm (1-hr average) 0.053 ppm (annual average)	0.18 ppm (1-hr average) 0.03 ppm (annual average)
Sulfur Dioxide (SO ₂)	0.075 ppm (1-hr average) 0.14 ppm (24-hr average)	0.25 ppm (1-hr average) 0.04 ppm (24-hr average)
Lead	1.5 µg/m ³ (3-month average)	1.5 µg/m ³ (30-day average)
Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hr average)	50 µg/m ³ (24-hr average) 20 µg/m ³ (annual average)

Pollutant	Federal Standard	California Standard
Particulate Matter (PM _{2.5})	35 µg/m ³ (24-hr average) 12 µg/m ³ (annual average)	12 µg/m ³ (annual average)

ppm= parts per million

µg/m³ = micrograms per cubic meter

Source: CARB 2016.

The general characteristics of the six criteria pollutants regulated by the Federal Clean Air Act and California Clean Air Act are described below.

Ozone

Ozone (O₃) is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG)/volatile organic compounds (VOC).¹ ROG is composed of non-methane hydrocarbons (with specific exclusions), and NO_x is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and nitrogen dioxide (NO₂). NO_x is formed during the combustion of fuels, while ROG is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O₃ readily combines with many different atmosphere components. Consequently, high O₃ levels tend to exist only while high ROG and NO_x levels are present to sustain the O₃ formation process. Once the precursors have been depleted, O₃ levels rapidly decline. Because these reactions occur on a regional rather than local scale, O₃ is considered a regional pollutant. In addition, because O₃ requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. Groups most sensitive to O₃ include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (USEPA 2022a). Depending on the level of exposure, O₃ can cause coughing and a sore or scratch throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; and aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (USEPA 2022a).

¹ CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term ROG is used in this report.

Nitrogen Dioxide

Nitrogen dioxide (NO₂) is a by-product of fuel combustion. The primary sources are motor vehicles and industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO₂, creating the mixture of NO and NO₂, commonly called NO_x. NO₂ is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO₂ can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO₂ may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are generally at greater risk for the health effects of NO₂ (USEPA 2022a). NO₂ absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of O₃/smog and acid rain.

Sulfur Dioxide

Sulfur dioxide (SO₂) is included in a group of highly reactive gases known as “oxides of sulfur.” The largest sources of SO₂ emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO₂ emissions include industrial processes such as extracting metal from ore and burning fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Short-term exposures to SO₂ can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO₂ (USEPA 2022a).

Asbestos

Asbestos is a highly friable material often found in older buildings (pre-1979), typically used as insulation in walls or ceilings. It was formerly popular as an insulating material; however, it can pose a health risk when very small particles become airborne. In conformance with the Clean Air Act, USEPA established the National Emissions Standards for Hazardous Air Pollutants to protect the public. The asbestos regulations under National Emissions Standards for Hazardous Air Pollutants control work practices during the demolition and renovation of institutional, commercial, or industrial structures. Following identification of friable asbestos, the federal Occupational Safety and Health Administration required that asbestos trained and certified abatement personnel perform asbestos abatement. The Occupational Safety and Health Administration also required that all asbestos containing material removed from onsite structures be hauled to a licensed receiving facility and disposed of under proper manifest by a transportation company certified to handle asbestos. Disposal of any asbestos containing material is also regulated by the County Fire Department, and specific requirements are determined during the permitting process.

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the USEPA’s regulatory efforts to remove lead from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred with the permanent phase-out of leaded gasoline, controls on emissions on emissions of Pb compounds through EPA’s air toxics program, and other national and state regulations. The result was a decrease of airborne Pb concentrations by 98 percent between 1980 and 2005 (U.S.

EPA 2022a). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered intelligence quotient (USEPA 2022a).

Suspended Particulate Matter

Particulates less than 10 microns in diameter (PM₁₀) and less than 2.5 microns in diameter (PM_{2.5}) are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM₁₀ and PM_{2.5} are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM₁₀ and PM_{2.5} can be very different. PM₁₀ is generally associated with dust mobilized by wind and vehicles. In contrast, PM_{2.5} is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM₁₀ can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For PM_{2.5}, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2023a).

c. Current Ambient Air Quality

Local air districts and the CARB monitor ambient air quality to assure that air quality standards are met, and if they are not met, to also develop strategies to meet the standards. Air quality monitoring stations measure pollutant ground-level concentrations ten feet aboveground level, typically. Depending on whether the standards are met or exceeded, the local air basin is classified as in “attainment” or “non-attainment.” Some areas are unclassified, which means no monitoring data are available. Unclassified areas are considered to be in attainment. Table 4.2-2 summarizes the State and federal attainment status for criteria pollutants in the Basin.

Table 4.2-2 Attainment Status of the North Central Coast Air Basin

Pollutant	State Standard (CAAQS)	Federal Standard (NAAQS)
Ozone	Non-attainment/Transitional	Unclassified/Attainment
Inhalable Particulates (PM₁₀)	Non-attainment	Unclassified
Fine Particulates (PM _{2.5})	Attainment	Unclassified/Attainment
Carbon Monoxide (CO)	Unclassified (Santa Cruz County)	Unclassified/Attainment
Nitrogen Dioxide (NO ₂)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO _x)	Attainment	Unclassified
Lead	Attainment	Unclassified/Attainment

Source: CARB 2022

CAAQS = California Ambient Air Quality Standard, NAAQS = National Ambient Air Quality Standard

Note: Non-attainment pollutants are highlighted in **Bold**.

As shown in Table 4.2-2, although the Basin is in attainment or unclassified for all NAAQS, it is designated as non-attainment with respect to the more stringent California Ambient Air Quality Standard (CAAQS) PM₁₀ standard and eight-hour ozone standard.

Ambient air quality is monitored at seven monitoring stations throughout the Basin: Scotts Valley, Santa Cruz, Hollister, Salinas, Carmel Valley, Pinnacles National Monument, and King City. Table 4.2-3 summarizes the representative annual air quality data for the Watsonville vicinity over the years 2019-2021, which is the most recent available data. The nearest monitoring station to the plan area is Santa Cruz-2544 Soquel Avenue. As indicated in Table 4.2-3, there were thirteen exceedances of PM_{2.5} in 2020 during this time period.

Table 4.2-3 Ambient Air Quality Data

Pollutant	2019	2020	2021
Ozone (ppm), Worst 1-Hour	0.068	0.070	0.072
Number of days of State exceedances (>0.09 ppm)	0	0	0
Ozone (ppm), 8-Hour Average	0.059	0.057	0.058
Number of days of State exceedances (>0.07 ppm)	0	0	0
Number of days of Federal exceedances (>0.075 ppm)	0	0	0
Carbon Monoxide (CO) (ppm), Highest 8-Hour Average	*	*	*
Number of days of above State or Federal standard (>9.0 ppm)	*	*	*
Particulate Matter <10 microns, µg/m ³ , Worst 24 Hours	*	*	*
Number of days above State standard (>50 µg/m ³)	*	*	*
Number of days above Federal standard (>150 µg/m ³)	*	*	*
Particulate Matter <2.5 microns, µg/m ³ , Worst 24 Hours	21.3	90.4	17.5
Number of days above Federal standard (>65 µg/m ³)	0	13	0
* There was insufficient (or no) data available to determine the value. ppm = parts per million; µg/m ³ = micrograms per cubic meter Source: CARB 2023bi			

d. Hazardous Air Pollutants/Toxic Air Contaminants

Both USEPA and CARB regulate Hazardous Air Pollutants (HAPs)/toxic air contaminants (TACs). According to Section 39655 of the California Health and Safety Code, a TAC is “an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health.” In addition, 189 substances that have been listed as federal HAPs pursuant to Section 7412 of Title 42 of the United States Code are TACs under the State’s air toxics program pursuant to section 39657(b) of the California Health and Safety Code.

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are airborne substances diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and

thus is a subset of PM_{2.5}. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2023c). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (U.S. EPA 2020).

e. Sensitive Receptors

Certain population groups are more sensitive to air pollution than the general population; in particular, sensitive receptors include children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases. Sensitive receptors that are in proximity to localized sources of particulate matter, toxics, and CO are of particular concern. As described in the MBARD's 2008 CEQA Guidelines, a sensitive receptor is defined as: any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes.

MBARD recommends evaluating potential impacts to sensitive receptors located within 1,000 feet of a subject site. In addition to the residential developments (including retirement and nursing homes), sensitive receptors within the plan area include any daycare centers and preschools located within the boundaries including in-home facilities as well as several schools such as Radcliff Elementary School, La Manzana School, Watsonville Prep School, Linscott Charter School, Watsonville High School, Central Christian School, and Moreland Notre Dame High School. There are no hospitals within the plan area.

4.2.2 Regulatory Setting

a. Federal Regulations and State

As discussed in more detail below, the federal and State governments have been empowered by the federal and State Clean Air Acts to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. USEPA is the federal agency designated to administer air quality regulation, while CARB is the State equivalent in California. Local control in air quality management is provided by CARB through county-level or regional (multi-county) air pollution control districts. CARB establishes air quality standards and is responsible for control of mobile emission sources, while the local air pollution control districts are responsible for enforcing standards and regulating stationary sources. CARB has established 14 air basins statewide.

Federal Clean Air Act

The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the Federal Clean Air Act. The Federal Clean Air Act was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 Federal Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of

the 1970s and 1980s. 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 Clean Air Act amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The Federal Clean Air Act allows states to adopt more stringent standards or to include other additional pollution species.

National Ambient Air Quality Standards

As discussed above, the Federal Clean Air Act requires USEPA to establish primary and secondary NAAQS for a number of criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants that are known to be hazardous to human health. NAAQS have been established for the following pollutants: ozone, CO, SO₂, PM₁₀, PM_{2.5}, and lead.

Title III of the Federal Clean Air Act

As discussed above, HAPs are the air contaminants identified by USEPA as known or suspected to cause cancer, other serious illnesses, birth defects, or death. The Federal Clean Air Act requires USEPA to set standards for these pollutants and reduce emissions of controlled chemicals. Specifically, Title III of the Federal Clean Air Act requires USEPA to promulgate National Emissions Standards for Hazardous Air Pollutants for certain categories of sources that emit one or more pollutants that are identified as HAPs. The Federal Clean Air Act also requires USEPA to set standards to control emissions of HAPs through mobile source control programs. These include programs that reformulated gasoline, national low emissions vehicle standards, Tier 2 motor vehicle emission standards, gasoline sulfur control requirements, and heavy-duty engine standards.

HAPs tend to be localized and are found in relatively low concentrations in ambient air. However, they can result in adverse chronic health effects if exposure to low concentrations occurs for long periods. Many HAPs originate from human activities, such as fuel combustion and solvent use. Emission standards may differ between “major sources” and “area sources” of the HAPs/TACs. Under the Federal Clean Air Act, major sources are defined as stationary sources with the potential to emit more than 10 tons per year of one HAP or more than 25 tons per year of any combination of HAPs; all other sources are considered area sources. Mobile source air toxics are a subset of the 188 HAPs. Of the 21 HAPs identified by USEPA as mobile source air toxics, a priority list of six priority HAPs were identified that include: diesel exhaust, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. While vehicle miles traveled in the United States are expected to increase by 64 percent over the period 2000 to 2020, emissions of mobile source air toxics are anticipated to decrease substantially as a result of efforts to control mobile source emissions (by 57 percent to 67 percent depending on the contaminant).

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. CARB is the State air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California Clean Air Act. CARB oversees local district compliance with California and federal laws, approves local air quality plans, submits the State Implementation Plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California Clean Air Act requires CARB to establish CAAQS. Similar to the NAAQS, CAAQS have been established for the following pollutants: ozone, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, lead, vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In most cases, the CAAQS are more stringent than the NAAQS pollutants. The California Clean Air Act requires that all local air districts in the State endeavor to achieve and maintain the CAAQS by the earliest practical date. The California Clean Air Act specifies that local air districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources, and provides districts with the authority to regulate indirect sources.

California Air Resources Board Air Quality and Land Use Handbook

In April 2005, CARB released the final version of its Air Quality and Land Use Handbook: A Community Health Perspective. This guidance document is intended to encourage local land use agencies to consider the risks from air pollution before they approve the siting of sensitive land uses such as residences near sources of TACs such as freeway and high traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations and industrial facilities. These advisory recommendations include general setbacks or buffers from air pollution sources. However, unlike industrial or stationary sources of air pollution, the siting of new sensitive land uses does not require air quality permits or approval by air districts and as noted above, the CARB handbook provides guidance rather than binding regulations.

b. Regional Regulations

MBARD regulates air quality in the Basin. MBARD is responsible for attainment planning related to criteria air pollutants as well as district rule development and enforcement. To assist agencies with air quality analyses prepared for CEQA assessments, MBARD published the CEQA Air Quality Guidelines document (2008b). The purpose of the Guidelines is to assist in the review and evaluation of air quality impacts from projects that are subject to CEQA. The Guidelines are an advisory document intended to provide lead agencies, consultants, and project proponents with uniform procedures for assessing potential air quality impacts and preparing the air quality section of environmental documents. The Guidelines are also intended to help these entities anticipate areas of concern from the MBARD in its role as a lead and/or responsible agency for air quality.

Air Quality Management Plan

In accordance with the California Clean Air Act, the MBARD developed the 2008 Air Quality Management Plan (AQMP) for the Monterey Bay Region (MBARD, 2008a). The 2008 AQMP is a transitional plan shifting focus of the MBARD's efforts from achieving the 1-hour ozone component of the CAAQS to achieving the 8-hour ozone requirement. The plan includes an updated air quality trends analysis, which reflects both the 1- and 8-hour standards, as well as an updated emission inventory, which includes the latest information on stationary, area, and mobile emission sources.

In April 2013, MBARD adopted the 2012 Triennial Plan Revision (2012 AQMP Revision), which assesses and updates elements of the 2008 AQMP, including the air quality trends analysis, emission inventory, and mobile source programs. The 2012 AQMP Revision only addresses attainment of the State ozone standard. In 2012, USEPA designated the Basin as attainment of the current national 8-hour ozone standard of 0.075 ppm and in 2015 the national standard was revised to 0.070 ppm.

In March 2017, MBARD adopted the 2012-2015 AQMP, which documents the District's progress toward attaining the State ozone standard. Similar to the 2012 AQMP Revision, the 2012-2015 AQMP only addresses attainment of the State ozone standard. As mentioned, USEPA designated the Basin as attainment of the current national 8-hour ozone standard in the 2012 AQMP Revision and the Basin continues to be in attainment with the stricter national standard.

The following MBARD rules would limit emissions of air pollutants from construction and operation of the proposed project:

- Rule 400 (Visible Emissions) – Discharge of visible air pollutant emissions into the atmosphere from any emission source for a period or periods aggregating more than three minutes in any one hour, as observed using an appropriate test method, is prohibited.
- Rule 402 (Nuisances) – No person shall discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 425 (Use of Cutback Asphalt) – The use of cutback asphalt (asphalt cement that has been blended with petroleum solvents) is restricted.
- Rule 426 (Architectural Coatings) – This rule limits the emissions of ROGs from the use of architectural coatings.

c. Local Regulations

City of Watsonville 2005 General Plan

The Watsonville 2005 General Plan Environmental Resources and Transportation and Circulation Elements includes the following goals, policies, and implementation measures pertaining to air quality that are relevant to this analysis:

Environmental Resource Management Element

- **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.
- **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.C Air Quality:** The City shall cooperate with MBARD to maintain and improve regional air quality.
 - **Implementation Measure 9.C.1, Referral to MBARD:** The City shall refer projects with identifiable air quality impacts to the MBARD for recommendation or appropriate air quality mitigations.
 - **Implementation Measure 9.C.2, Alternate Travel Modes:** In order to reduce automobile related pollution, the City shall plan for and encourage the use of transit, ridesharing, bicycles, and walking as alternatives to automobile travel, and the use low-emission and electric vehicles.

- **Implementation Measure 9.C.3, Housing Jobs Linkage:** The City shall encourage new residential development to include housing suitable to employees of workplaces in the City and its immediate environs in order to minimize commuting and the motor vehicle emissions thus generated. The City shall strive to locate housing and job land uses to enhance the use of carpooling and transit.
 - **Implementation Measure 9.C.4, Design Review:** The City shall require new development to include consideration for transit, Transportation Demand Management, and alternative travel modes in project designs including but not limited to transit stops, car, and vanpool preferred parking, and bicycle access and storage facilities.
 - **Implementation Measure 9.C.8, Transportation Management Associations:** The City shall promote the creation of transportation management associations in areas of high employment density.
 - **Implementation 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.
 - **Implementation 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.
- **Policy 9.J Energy:** The City shall strive to reduce non-renewable energy resource consumption and promote the use of alternative energy resources.
- **Implementation 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.
 - **Implementation Measure 9.J.2, Development:** The City shall encourage energy efficient design and design which utilizes solar opportunities in residential, commercial, and industrial development.
 - **Implementation 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.

Transportation and Circulation Element

- **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.
- **Implementation Measure 10.K.1, New Construction and Improvements:** New construction and improvements to designated streets shall include facilities for safe bicycle travel consistent with the City's Bicycle Plan.
 - **Implementation Measure 10.K.2, Designation of Bicycle Lanes:** The City shall designate specified arterials for the development of bicycle lanes, consistent with the Bicycle Plan.

- **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.
 - **Implementation Measure 10.N.1, Construction/Improvement:** The City shall require facilities for safe pedestrian travel as part of new construction or improvements to existing streets.
 - **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.
 - **Implementation Measure 10.P.1, Access to Adjoining Land Uses:** The City shall require pedestrian access between adjoining multiple family residential developments, and from such residential developments to adjacent recreational or commercial areas.

4.2.3 Impact Analysis

a. Significance Thresholds and Methodology

Significance Thresholds

The analysis of the project's air quality impacts follows the guidance and methodologies recommended in the MBARD CEQA Air Quality Guidelines (2008) as well as Appendix G of the State *CEQA Guidelines*.

According to Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant environmental effects on air quality if it would:

- 1) Conflict with or obstruct implementation of the applicable air quality plan;
- 2) 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 (including releasing emissions which exceed qualitative thresholds for ozone precursors);
- 3) Expose sensitive receptors to substantial pollutant concentrations; and/or
- 4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The State *CEQA Guidelines* further state that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the determinations above.

MBARD Thresholds of significance

MBARD has issued criteria for determining the level of significance for project-specific impacts within its jurisdiction in accordance with the above thresholds. Based on criteria applied in or adapted from the MBARD Guidelines, the impacts related to emission of criteria air pollutants would be significant if the DWSP would:

- Be inconsistent with the adopted AQMP.
 - During construction, cause a violation of PM₁₀ CAAQS at nearby or upwind of sensitive receptors, based on whether the project would:

- Emit greater than 82 lb/day of PM₁₀ if located nearby or upwind of sensitive receptors; or
- Use equipment that is not “typical construction equipment” as specified in Section 5.3 of the MBARD CEQA Guidelines.
- During operations:
 - Generate direct (area source or stationary) plus indirect (operational or mobile) emissions of either ROG or NO_x that exceed 137 pounds per day (lbs/day);
 - Generate onsite emissions of PM₁₀ exceeding 82 lbs/day;
 - Generate direct emissions of CO exceeding 550 lbs/day; or
 - Generate direct emissions of SO_x exceeding 150 lbs/day.
- Cause or substantially contribute to a violation of a CO standard.
- MBARD’s Guidelines indicate that any of the following traffic effects should be assumed to generate a significant CO impact, unless CO dispersion modeling demonstrates otherwise:
 - Intersections or road segments that operate at Level of Service (LOS) D or better would operate at LOS E or F with the project's traffic.
 - Intersections or road segments that operate at LOS E or F where the volume-to-capacity ratio would increase 0.05 or more with the project's traffic.
 - Intersections that operate at LOS E or F where delay would increase by 10 seconds or more with the project's traffic.
 - Unsignalized intersections which operate at LOS E or F where the reserve capacity would decrease by 50 or more with the project's traffic.
 - The project would generate substantial heavy duty truck traffic or generate substantial traffic along urban street canyons or near a major stationary source of CO.

In addition to MBARD’s guidance from 2008 (MBARD 2008b), the Bay Area Air Quality Management District (2017) and South Coast Air Quality Management District (2003) also use the number of vehicles that pass through an intersection to determine if additional analysis is required. This is due to the drastic increase in efficiencies in automobiles with respect to CO emissions as well as the fact that their Air Districts, as with MBARD’s Air District, are in attainment for the Federal and State CO Standards. The SCAQMD studied four intersections in the 2003 AQMP and noted that the most congested intersection was that of Wilshire Boulevard and Veteran Avenue with an average daily vehicle count of 100,000. The 2003 AQMP (Table 4-10 of Appendix V in the AQMP) shows that emissions at this intersection were 4.6 ppm (1-hour average) and 3.2 (8-hour average). These are both substantially less than the CAAQS of 20 ppm and 5 ppm respectively. Therefore, if intersections are below 100,000 vehicles per day would not have the potential to case a CO Hotspot.

BAAQMD’s 2017 CEQA Guidelines have a screening analysis that identifies traffic volumes at affected intersections of less than 44,000 vehicles per hour, or 24,000 vehicles per hours where vertical and/or horizontal mixing is limited (e.g. tunnels, bridge underpass, below-grade roadway). For the purposes of this analysis, for any roadway that exceeds the MBARD’s LOS criteria, significance shall be determined using compliance with 100,000 vehicles per day or 24,000 vehicles per hour screening levels.

The MBARD guidelines state that odor impacts would be significant if the project would result in the emission of substantial concentrations of pollutants that produce objectionable odors, causing injury, nuisance, or annoyance to a considerable number of persons, or endangering the comfort, health, or safety of the public. If construction or operation of a project would emit pollutants associated with odors in substantial amounts, the analysis should assess the impact on existing or reasonably foreseeable sensitive receptors.

Air Quality Management Plan Consistency

Projects which increase population also generate population-related emissions, including those from motor vehicles, heating, and cooling emissions. Therefore, a project would conflict with or obstruct implementation of the 2012 – 2015 AQMP for the Monterey Bay Region if it is inconsistent with the Plan's population growth assumptions. Emissions have been forecast in the AQMP using population forecasts adopted by the Association of Monterey Bay Area Governments (AMBAG). Thus, a proposed project is consistent with the AQMP if the countywide increase in population resulting from the project will not cause the estimated cumulative population to exceed forecasts. Additionally, projects that do not exceed the construction or operational regional thresholds as discussed above would be considered to be consistent with the AQMP.

Cumulative Impacts

Given the nature of air quality impacts, the criteria for assessing cumulative impacts on localized air quality such as CO and PM₁₀ are the same as those for assessing individual project impacts, as listed under *Significance Thresholds* above. Projects that do not exceed MBARD's construction or operational thresholds and that are consistent with the AQMP would not have cumulatively considerable impacts on regional air quality (MBARD, 2008a).

Methodology

The analysis of air quality impacts conforms to the methodologies recommended in the MBARD's CEQA Air Quality Guidelines (2008). The handbook includes thresholds for emissions associated with both construction and operation of proposed projects.

Construction Emissions

The regional construction emissions associated with development envisioned in the DWSP were calculated using CalEEMod version 2022.1. As discussed in Section 2.0, *Project Description*, the project would be constructed over 20 to 30 years. As a conservative estimate of growth, the analysis assumes that in any year up to one-twentieth of the project would be constructed. This assumes construction would be completed within 20 years. As regional thresholds are identified in pounds per day as discussed under *Significance Thresholds* above, one year of growth was assumed. In order to estimate emissions from multiple mixed-use projects occurring at the same time, seven project scenarios were considered. The analysis assumes that all seven of these development scenarios could be under construction at the same time. These scenarios include:

- Residential and Retail
- Office and Retail
- Research and Development and Restaurant
- Industrial Park and Restaurant
- General Light Industrial and Restaurant

- Civic Center
- Government Office

Due to the nature of the DWSP, each construction scenario assumes the demolition of the one half of the growth. As specific sites are unknown, the analysis assumes that all soils will be balanced onsite. This is a reasonable assumption given that the plan area is relatively flat and would not require substantial grading or contouring to facilitate typical development. As a conservative estimate of emissions, it was assumed that construction could begin as early as September of 2023. The analysis assumes that one third of the project identified industrial and civic uses would be asphalt paved. Construction schedules, equipment fleets, and on-road worker, vendor and haul trucks, and architectural coating applications were determined using CalEEMod defaults.

Operational Emissions

Operational emissions associated with project implementation were estimated using CalEEMod defaults for mobile source emissions, area sources, and energy sources. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating and cooling. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings. Water and solid waste information were extracted from the Initial Study (see Appendix A).

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROPOSED PROJECT WOULD INTRODUCE ADDITIONAL HOUSING TO THE AREA AND CONTRIBUTE TO POPULATION GROWTH THAT CONFLICTS WITH THE GROWTH ASSUMPTIONS IN THE AIR QUALITY MANAGEMENT PLAN. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As noted above in *Methodology and Significance Thresholds*, a project would conflict with or obstruct implementation of the AQMP if it is inconsistent with the population growth assumptions included in the AQMP (MBARD, 2008b). As detailed in *Section 4.7 Population and Housing*, the current population of Watsonville is 50,669 and the average household size is approximately 3.52 persons per household. The proposed project would add an estimated 3,866 additional residential units, which would increase the City's population by 13,679 to approximately 64,348. According to AMBAG's population forecast, the City's population would be 56,344 in 2045. Therefore, the estimated population of 64,348 with buildout of the DWSP would exceed AMBAG's population forecasts for 2045 by approximately 8,004 people. Since the anticipated increase in population would be inconsistent with long-term growth projections for the county, implementation of the DWSP would conflict with an air quality plan.

As detailed in impact AQ-2, development under the DWSP would not exceed regional construction emissions for PM₁₀. However, operational emissions would exceed regional threshold of ROG, CO and PM₁₀. Therefore, development under the DWSP could conflict with the AQMP and impacts are potentially significant.

Mitigation Measures

AQ-1 *Conduct Project Specific Air Quality Analysis*

The City shall require future projects that are subject to discretionary approval and that are not found to be exempt from CEQA review to evaluate potential air quality impacts as part of project-level CEQA analysis and implement respective mitigation measures to minimize impacts that exceed MBARD project level thresholds.

Significance After Mitigation

There are no feasible mitigation measures available to reduce population and employment and be consistent with the objectives of the DWSP. Reducing the growth envisioned in the DWSP would not necessarily reduce population growth because people could still move to the region or Basin, but would reside outside of the plan area. Additionally, as the AQMP is updated to reflect new growth assumptions, the anticipated growth from the DWSP would be accounted for in the next AQMP emissions calculations. However, as the growth forecasts are currently inconsistent with AQMP projections, impacts would remain significant and unavoidable until that time.

As detailed under Impact AQ-2, even with the incorporation of Mitigation Measure AQ-1, there is the potential for ROG and CO emissions to exceed operational regulatory thresholds. Therefore, with the incorporation of mitigation, impacts related to conflict with an air quality management plan would remain significant and unavoidable.

Threshold 2: 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?

Impact AQ-2 CONSTRUCTION AND OPERATION OF DEVELOPMENT ENVISIONED BY THE DWSP WOULD RESULT IN THE TEMPORARY AND LONG-TERM GENERATION OF AIR POLLUTANTS, WHICH WOULD AFFECT LOCAL AIR QUALITY AND EXCEED MBARD THRESHOLDS. THEREFORE, THIS IMPACT IS SIGNIFICANT AND UNAVOIDABLE.

Construction Emissions

Construction emissions are generally referred to as temporary impacts that occur during construction activities but end shortly after construction is completed. Fugitive dust emissions are among the pollutants of greatest concern with respect to construction activities. General site grading operations are the primary sources of fugitive dust emissions. However, these emissions can vary greatly, depending on the level of activity, the specific operations taking place, the number and types of equipment operated, vehicle speeds, local soil conditions, weather conditions, and the amount of earth disturbance from site grading. Emissions of ozone precursors NO_x and ROG are primarily generated by the operation of off-road construction equipment and mobile sources such as delivery vehicles and construction worker vehicles. Generation of these emissions vary as a function of the types and number of heavy-duty, off-road equipment used and the intensity and frequency of their operation, as well as vehicle trips per day associated with delivery of construction materials, the export of soil, vendor trips, and worker commute trips.

Construction of the development envisioned in the DWSP would result in the temporary generation of vehicle and equipment exhaust and fugitive dust over the course of construction. Daily construction emissions related to one year of construction are presented in Table 4.2-4.

Table 4.2-4 Estimated Construction Emissions

Year	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Residential and Retail	15.1	25.0	143.2	0.2	15.3	7.0
Office and Retail	16.5	29.0	36.0	0.1	1.6	1.3
Research and Development and Restaurant	24.3	29.0	36.2	0.1	1.7	1.3
Industrial Park and Restaurant	59.9	29.2	37.1	0.1	1.7	1.3
General Light Industrial and Restaurant	100.7	68.5	73.7	0.1	9.0	5.4
Civic Center	12.5	28.9	36.0	0.1	1.6	1.3
Government Office	12.5	28.9	36.0	0.1	1.6	1.3
Maximum Daily Construction Emissions	242	238	398	1	32	19
MBARD Significance Threshold	N/A	N/A	N/A	N/A	82	N/A
Exceeds Threshold?	N/A	N/A	N/A	N/A	No	N/A

See Appendix B CalEEMod worksheets.

As shown in Table 4.2-4, construction of the development envisioned in the DWSP would result in a maximum of 32 lbs/day of PM₁₀, which is below the MBARD threshold of 82 lbs/day of PM₁₀. Furthermore, compliance with MBARD Rule 400 (Visible Emissions) and Rule 425 (Use of Cutback Asphalt) would further reduce emissions of dust particulates during construction activity. Analysis quantifies implementation of one of MBARD's BMP for controlling fugitive dust. The analysis assumes that active construction areas would be watered at least twice daily. Although the estimated annual emissions would be below thresholds of significance for PM₁₀, MBARD recommends the use of the following additional BMPs for the control of short-term construction generated emissions in any event:

- Prohibit all grading activities during periods of high wind (over 15 mph).
- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed areas.
- Haul trucks shall maintain at least two feet of freeboard.
- Cover all trucks hauling soil, sand, and other loose materials.
- Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
- Plant vegetative ground cover in disturbed areas as quickly as possible.
- Cover inactive storage piles.
- Install wheel washers at the entrance to construction sites for all exiting trucks.
- Pave all roads on construction sites.
- Sweep streets, if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the MBARD shall be visible to ensure compliance with Rule 402 (Nuisance).

- Limit the area under construction at any one time.

Implementation of the MBARD recommended BMPs or equivalent measure would be required for compliance with the City's General Plan Implementation Measure 9.C.10, requiring a dust abatement program during construction. Even without implementation of the MBARD recommended BMPs, the DWSP's would result in less than significant impacts related to construction air emissions.

Operational Emissions

Long-term operational emissions associated with the DWSP are those attributed to vehicle trips (mobile emissions), the use of natural gas and electricity (energy source emissions), and consumer products, architectural coatings, and landscape maintenance equipment (area source emissions) from development envisioned in the DWSP. CalEEMod was used to calculate emissions based on the proposed land uses for the plan area and the number of trips generated. Table 4.2-5 illustrates the long-term operational emissions from the project. The analysis does not take into account the Title 24 requirement of implementation of electric vehicle charging stations for development or projects that include vehicle parking, nor does it account for ambient emissions reductions from the potential removal of existing land uses. As this is a program level analysis, the exact nature and location of the individual development projects is unknown and therefore the amount of electric vehicle charging stations, or the amount of demolition required is unknown. Therefore, accounting for removal of these emissions would be speculative. As shown in Table 4.2-5, emissions from operational emissions would exceed MBARD's significance thresholds for ROG, CO, and PM₁₀. Impacts from operational emissions would be potentially significant.

Table 4.2-5 Estimated Operational Emissions

Category	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	129	0	253	0	0	0
Energy	2	33	18	0	3	3
Mobile	128	67	776	2	83	15
Total*	259	100	1,047	2	85	18
MBARD Significance Threshold	137	137	550	150	82	N/A
Exceeds Threshold?	Yes	No	Yes	No	Yes	N/A

*Numbers may not total due to rounding.

See Appendix B for CalEEMod worksheets.

Mitigation Measures

Implementation of Mitigation Measure AQ-1 is required.

Significance After Mitigation

The analysis does not take into account the Title 24 requirement of implementation of electric vehicle charging stations, nor does it account for net emissions from the potential removal of existing land uses. This would reduce overall DWSP operational emissions. Incorporation of these features and implementation of Mitigation Measure AQ-1 could reduce operational emissions to

below MBARD regulatory thresholds at the individual development level and below MBARD regulatory thresholds for PM₁₀ at the plan level. However, it is unknown if these reductions would reduce cumulative DWSP operational emissions of ROG and CO to below regulatory thresholds. Therefore, impacts would remain significant and unavoidable for operational emissions.

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 THE DEVELOPMENT ENVISIONED IN THE DWSP WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION MEASURES.

Construction Dust

As described under Impact AQ-2, emissions from construction of development envisioned in the DWSP would not exceed MBARD daily thresholds. The nearest existing sensitive receptors to the area proposed for construction could include existing sensitive receptors adjacent to new development site.

MBARD recommends evaluating potential impacts to sensitive receptors within 1,000 feet of a project site; however, as shown in Impact AQ-2, the highest daily PM₁₀ emissions associated with construction would not exceed the MBARD's threshold of 82 pounds per day for seven development scenarios occurring at the same time and would be substantially less for a single development scenario within 1,000 feet of a receptor. This estimate for PM₁₀ emissions included the assumption of watering two times per day as well as Rule 426 (Architectural Coatings) but does not include compliance with MBARD Rule 400 (Visible Emissions) or Rule 425 (Use of Cutback Asphalt), which would further reduce emissions of dust particulates. Therefore, the DWSP would have a less than significant impact on sensitive receptors as it relates to construction dust emissions.

Short-Term Construction Toxic Air Contaminants

The greatest potential for exposure to substantial pollutant concentrations and TAC emissions during construction of development envisioned in the DWSP would be diesel particulate emissions associated with heavy duty equipment operations and truck traffic. Diesel exhaust causes health effects from both short-term or acute exposures, and long-term chronic exposures. The type and severity of health effects depends upon several factors including the amount of chemical exposure and the duration of exposure. Acute exposure to diesel exhaust may cause irritation to eyes, nose, throat and lungs, and some neurological effects, such as lightheadedness. Acute exposure may also elicit a cough or nausea as well as exacerbated asthma. Chronic exposure to diesel exhaust in experimental animal inhalation studies has shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that diesel exhaust is a carcinogen. Human epidemiological studies demonstrate an association between diesel exhaust exposure and increased lung cancer rates in occupational settings.

The specific locations within the plan area of future construction activity for the DWSP are not currently known. Because the exact nature of the construction activities on an individual development level, as well as the distance to sensitive receptors is unknown, the development under the DWSP could potentially result in substantial pollutant concentrations during construction activities. As a result, this impact would be potentially significant.

Operational Toxic Air Contaminants

Diesel particulate matter would be emitted from diesel-fueled vehicles generated by the development envisioned in the DWSP during operation and by existing traffic adjacent to the project site. The particulate matter component of diesel exhaust has been classified as a TAC by CARB based on its potential to cause cancer and other adverse health effects. Urban roads with traffic volumes exceeding 100,000 vehicles per day or rural roads with volumes greater than 50,000 vehicles per day are potentially hazardous sources of TACs within 500 feet of a sensitive receptor. There are no roadways within the DWSP area that have traffic volumes that exceed these thresholds (Kimley Horn, 2022). Highway 1, which does have traffic volumes exceeding 50,000 vehicles per day is located approximately 5,500 feet west of the DWSP plan area, well beyond the 500 feet threshold.

Additionally, land uses in the plan area could incorporate generators, other permitted sources, potentially unpermitted sources and potentially heavy-duty truck traffic in excess of 100 vehicles per day. Permitted sources such as generator use, would be required by MBARD to be below regulatory risk thresholds and would not represent a potential impact. However, given the exact nature of the development is unknown as is the potential inclusion of unpermitted sources and/or potential for heavy-duty trucks to exceed 100 vehicles per day at any site, coupled with the unknown distance between these sources and the potential receptors, operational health impacts would be potentially significant.

CO Hotspots

Areas with high vehicle density and poor air circulation, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as carbon monoxide “hot spots,” which can expose sensitive receptors to substantial pollutant concentrations. Specifically, hot spots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the NAAQS of 35.0 ppm or the CAAQS of 20.0 ppm. Where intersections may operate under conditions that could result in elevated CO concentrations, sensitive receptors could be exposed to the CO hotspot.

The Transportation Impact Analysis (TIA) (see Appendix E) studied nine intersections within the plan area for traffic congestion. Under existing and existing plus project conditions all nine intersections operate within acceptable City standards. Under future plus project all intersections would also operate acceptable with the exception of Riverside Drive and Main Street which would operate unacceptable with traffic congestion. This intersection would have a daily peak hourly traffic count of 4,707 and a daily traffic count of approximately 47,000 both of which are below the 24,000 hourly and 100,000 daily numeric screening levels. Additionally, the TIA indicates that this intersection is highly influenced by regional traffic originating outside of Watsonville. The TIA also indicates that there are future local and regional projects that would have a positive impact on traffic volumes and delay at this intersection. This, coupled with hourly and daily threshold being below numeric screening levels, results in CO hotspot impacts that are less than significant.

Mitigation Measures

Implementation of Mitigation Measures AQ-1, AQ-3(a) and AC-3(b) are required.

AQ-3(a) Construction Equipment

The project applicant for individual developments or projects envisioned in the DWSP shall ensure the following requirements are incorporated into applicable bid documents, purchase orders, and contracts. Contractors shall confirm the ability to supply the compliant construction equipment prior to any ground-disturbing and construction activities:

- Mobile off-road construction equipment (wheeled or tracked) greater than 50 hp used during construction of the project shall meet the U.S. EPA Tier 4 final standards. In the event of specialized equipment use where Tier 4 equipment is not commercially available at the time of construction, the equipment shall, at a minimum, meet the Tier 3 standards. Zero-emissions construction equipment may be incorporated in lieu of Tier 4 final equipment. A copy of each equipment's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each piece of equipment.
- Mobile off-road construction equipment less than 50 hp used during construction of the individual projects shall be electric or other alternative fuel type. A copy of each unit's certified tier specification or model year specification shall be available to the City upon request at the time of mobilization of each applicable unit of equipment.
- Electric hook-ups to the power grid shall be used instead of temporary diesel- or gasoline-powered generators, whenever feasible during construction of development or projects envisioned in the DWSP. If generators need to be used, the generators shall be non-diesel generators.

AQ-3(b) Operational Health Risk Assessment

The City shall require all applicants for development projects in the plan area that are within the buffer distances cited in the CARB's Air quality and Land Use Handbook: A Community Health Perspective April 2005, and incorporate any of the following features, to conduct an operational health risk assessment. The health risk assessment shall follow MBARD and the Office of Environmental Health Hazards Assessment guidelines. The health risk analysis shall mitigate the risk in exceedance of regulatory thresholds to below the regulatory thresholds. The features that shall require an operational health risk analysis include:

- Incorporation of unpermitted sources (such as industrial processes that emit TACs);
- Incorporation of diesel heavy duty-vehicles greater than 100 trips per day; or
- Incorporation of more than 300 hours per week of diesel transportation refrigeration unit operations.

Significance After Mitigation

Incorporation of Mitigation Measure AQ-1 would require all individual development envisioned in the DWSP that are required to undergo CEQA analysis to complete a development specific air quality analysis. Mitigation Measure AQ-3(a) requires the use of Tier 4 equipment, alternative equipment, and electric hook-ups during construction of development in the DWSP. These measures would address and reduce TAC impacts from construction. Implementation of Mitigation Measure AQ-3(a) would reduce TAC impacts to below regulatory thresholds, and impacts from construction TACs would be reduced to less than significant levels.

Incorporation of Mitigation Measure AQ-3(b) would require an operational health risk assessment for development projects that meet the provided criteria and to mitigate any potential operational

health risks to below regulatory thresholds. Therefore, implementation of this mitigation measure would reduce TAC risks from operational activities to a less than significant level.

Overall, impacts from construction and operational TAC's would be reduced to less than significant with the implementation of mitigation.

Threshold 4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 THE PROJECT WOULD HAS THE POTENTIAL TO CREATE OBJECTIONABLE ODORS THAT WOULD AFFECT NEIGHBORING PROPERTIES. IMPACTS RELATED TO ODORS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, animal farms, fiberglass molding, and other industrial uses. While the majority of land uses identified under the DWSP would not be associated with objectionable odors, there is the potential for some of the industrial development envisioned in the DWSP to fall within food processing or other potential odor source categories in proximity to residential uses. Therefore, the DWSP would have the potential to result in significant impacts during operation of development envisioned in the DWSP.

During construction activities for development in the DWSP, short-term, temporary odors from vehicle exhaust and construction equipment engines would occur. The plan area is without substantially tall buildings, such as high-rise towers, to block air movement and hold odors, construction-related odors would disperse and dissipate fairly quickly and would not cause substantial odors at the closest sensitive receptors. In addition, construction-related odors would be relatively short-term and would cease upon completion of construction. Therefore, impacts related to objectionable odors during construction or operation of development envisioned in the DWSP would be less than significant.

Mitigation Measures

Implementation of Mitigation Measure AQ-1 is required.

Significance After Mitigation

Implementation of Mitigation Measure AQ-1 requires the analysis of air pollutant emissions of future individual projects in the plan area subject to CEQA. As part of the analysis, odor emissions would be analyzed for those projects that may fall into an odor source category. Where emissions of odors are found to be potentially significant, odor emissions would be mitigated to less than significant levels through measures developed specific to that individual project. The applicant or owner of that project would implement the specific measures. Therefore, with the implementation of Mitigation Measure AQ-1, overall DWSP odor emissions would be reduced to less than significant levels.

c. Cumulative Impacts

IMPACT AQ-C1: THE DWSP WOULD HAVE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO A SIGNIFICANT CUMULATIVE IMPACT RELATED TO EMISSIONS OF AIR POLLUTION AND CONFLICTS WITH AN APPLICABLE AIR QUALITY MANAGEMENT PLAN.

The geographic scope for considering cumulative impacts to air quality is the Basin. Air pollutants have impacts that are usually, though not always, cumulative by nature. Any new source of pollution may combine with other cumulative projects to result in violations of criteria pollutant standards if the existing background sources cause nonattainment conditions, as they do according to the State standards for ozone and particulate matter in MBARD. Air districts manage attainment of the criteria pollutant standards by adopting rules, regulations, and attainment plans, which comprise a multifaceted programmatic approach to such attainment. Because attainment is measured within an air basin, the use of the Basin for the cumulative impacts assessment area is reasonable.

The proposed project would generate ROG and NO_x emissions, both precursors to ozone, throughout construction activities and through long-term operations. When high levels of ROG and NO_x are present, ozone is able to be formed, however once the precursors decline, ozone levels also decline. As shown in Table 4.2-5, ROG emissions would exceed MBARD thresholds during operations. Emissions of PM₁₀ would occur throughout construction and operations of the proposed project. These emissions, as shown in Table 4.2-4 and Table 4.2-5, would not exceed MBARD thresholds during construction but would exceed MBARD thresholds during operations.

MBARD's approach to determining cumulative air quality impacts for criteria air pollutants is the same as for assessing individual project impacts. A project that does not exceed MBARD's construction or operational thresholds and is consistent with the 2012 - 2015 AQMP would not have cumulatively considerable impacts on regional air quality (MBARD, 2008b). Since the proposed project emissions of ROG, PM₁₀ and CO, would exceed MBARD thresholds during operations, exceedances of ROG and CO cannot be fully mitigated to below thresholds, and because the project would be inconsistent with the AQMP, cumulative impacts would be significant and unavoidable.

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4.3 Biological Resources

This section addresses impacts to biological resources, including special status species, sensitive natural communities, regulated waters and wetlands, sensitive habitat and mature native trees, and wildlife movement corridors.

4.3.1 Setting

Land Cover Types

The entire DWSP plan area consists of urban land cover. Most of the plan area is developed with small sections of non-native vegetation and bare ground. The General Plan land use designations include Central Commercial, General Commercial, Industrial, Public/Quasi-Public, Residential High Density, and Residential Low Density. No native vegetative communities exist within the plan area; however, scattered ornamental vegetation and native plants are present throughout the plan area.

Special Status Species

Special status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS) under the Federal Endangered Species Act; those listed or candidates for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act; animals designated as “Species of Special Concern” by CDFW; and CDFW Special Plants, specifically those with a California Rare Plant Rank of 1A, 1B and 2 as assigned by the California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (2022). A number of special status wildlife species are also considered to be of “local concern” by the County of Santa Cruz. Animals in this category are of concern because they have limited distributions, are experiencing local or regional population declines, are vulnerable to current or future threats to their preferred habitat, and/or are of unusual scientific, recreational, or educational value.

Data used to characterize the biological resources on and adjacent to the plan area included aerial photographs, topographic maps, and accepted scientific texts to identify species. Other data on biological resources were collected from numerous sources, including relevant literature, maps of natural resources, and queries of the Information for Planning and Consultation system (IPaC; USFWS 2022a), California Natural Diversity Database (CNDDDB; CDFW 2022a), and online Inventory of Rare and Endangered Plants of California (Inventory; CNPS 2022). The query of these data sources was conducted in October 2022 for a 5-mile radius for IPaC, and for the USGS *Watsonville West* and 7 surrounding 7.5-minute series quadrangles for CNDDDB and Inventory.¹ Standard queries of the CNDDDB and Inventory include eight surrounding quadrangles; however, one of the quadrangles surrounding *Watsonville West* quadrangle is entirely within the Pacific Ocean and was not included in this analysis. The Critical Habitat Mapper (USFWS 2022b), National Wetlands Inventory (USFWS 2022c), and eBird (The Cornell Lab of Ornithology 2022) were also queried.

A target list of special status plant and animal species that could potentially occur in the plan area was developed based on the outcome of the database queries and resultant lists of special status

¹ Typically, a topographic quadrangle is surrounded by 8 adjacent topographic quadrangles. However, the extent of the *Watsonville West* quadrangle extends to the coastline of the Pacific Ocean/Monterey, and there is no adjacent quadrangle to the west for this reason. Accordingly, the *Watsonville West* quadrangle has only seven surrounding USGS quadrangles.

species that were reviewed by Rincon's regional biological experts for accuracy and completeness. The final list of special status species and sensitive natural communities was evaluated based on documented occurrences in the eight-quadrangle search area and biologists' expert opinions on species known to occur in the region. The evaluation results and justification were compiled into a table (Appendix C).

Special Status Plant Species

Based on the database and literature review, 45 special status plant species occur in the eight-quadrangle area including and surrounding the plan area. All but one of these species were determined to be absent from the within the plan area due to a combination of factors including absence of suitable habitat, lack of specific microhabitat or soil requirements, such as serpentine, alkaline, or sandy soils, and/or the elevation range of the species outside the range of the plan area. One species, the Santa Cruz tarplant (*Holocarpha micradenia*), was determined to have a low potential to occur within the plan area. There are ten CNDDDB occurrences of this species within five miles of the plan area; however, there is only marginally suitable habitat for this species within the plan area, so it was determined to have a low potential to occur. Santa Cruz tarplant is listed as threatened by USFWS and endangered by CDFW.

Special Status Wildlife Species

Based on the database and literature review, 40 special status wildlife species occur in the eight-quadrangle area including and surrounding the plan area. Given the urbanized condition of the plan area, it does not contain adequate habitat to support the 40 special status wildlife species. A number of these species, primarily birds, have a low potential to occur within the plan area for brief periods of time as they disperse from more suitable habitat surrounding the plan area. For the purposes of CEQA analysis, non-listed special status species with low potential to occur on site will not be addressed further.

Wildlife Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitats that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be important as dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network. The California Essential Habitat Connectivity project commissioned by the California Department of Transportation and CDFW identifies "Natural Landscape Blocks" which support native biodiversity and the "Essential Connectivity Areas" which link them (Spencer et al. 2010). Because the plan area is thoroughly urbanized and more suitable habitat is nearby but outside of the plan area, the plan area does not provide value as a wildlife corridor.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

The federal Endangered Species Act protects federally listed wildlife species from harm or take, which is broadly defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.” Take can also include habitat modification or degradation that directly results in death or injury of a listed wildlife species. An activity can be defined as take even if it is unintentional or accidental. Listed plant species are provided less protection than listed wildlife species. Listed plant species are legally protected from take under the Federal Endangered Species Act only if they occur on federal lands.

The USFWS and the National Marine Fisheries Service have jurisdiction over federally listed, threatened, and endangered species under Federal Endangered Species Act. The USFWS also maintains lists of proposed and candidate species. Species on these lists are not legally protected under Federal Endangered Species Act, but may become listed in the near future and are often included in their review of a project.

The federal Migratory Bird Treaty Act, 16 U.S.C. Section 703, prohibits killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. The Migratory Bird Treaty Act protects whole birds, parts of birds, and bird eggs and nests; and prohibits the possession of all nests of protected bird species whether they are active or inactive. An active nest is defined as having eggs or young, as described by the Department of the Interior in its April 16, 2003 Migratory Bird Permit Memorandum. Nest starts (nests that are under construction and do not yet contain eggs) are not protected from destruction.

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, “to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird” (16 USC Section 703(a)). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act’s Eagle Permit Rule (50 CFR 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Clean Water Act

Areas meeting the regulatory definition of waters of the U.S. are subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) under provisions of Section 404 of the 1972 Clean Water Act. Waters of the U.S. include other waters, such as intrastate lakes, rivers, streams, mudflats, sandflats, playa lakes, natural ponds, territorial seas, and wetlands (33 Code of Federal Regulations, Part 328). Wetlands are generally identified by examining the vegetation, soils, and hydrology of an area use the “Routine Determination Method, On-Site Inspection Necessary (Section D)” outlined in the Corps Manual (Environmental Laboratory 1987). In non-tidal waters, USACE jurisdiction extends to the ordinary high water mark, which is defined in Title 33, Code of Federal Regulations, Part

328.3, as “the line on the shore established by the fluctuations of water and indicated by physical characteristics, such as a clear, natural line impressed on the bank, shelving, changes in the character of the soil, destruction of terrestrial vegetation or the presence of litter and debris.” This guidance is based on the identification of the ordinary high water mark through examination of physical evidence of surface flow in the stream channel; there is no hydrologic definition of the ordinary high water mark. Construction activities that directly impact waters of the U.S., such as grading and fill placement, require a Section 404 permit from the USACE.

b. State Regulations

California Endangered Species Act

The California Endangered Species Act (California Fish and Game Code, Chapter 1.5, Sections 2050-2116) prohibits the take of any plant or animal listed or proposed for listing as rare (plants only), threatened, or endangered. In accordance with the California Endangered Species Act, CDFW has jurisdiction over state-listed species (Fish and Game Code 2070). CDFW regulates activities that may result in take of individuals (i.e., “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”). Habitat degradation or modification is not expressly included in the definition of take under the California Fish and Game Code. CDFW, however, has interpreted take to include the “killing of a member of a species which is the proximate result of habitat modification.”

California Fish and Game Code

Certain sections of the California Fish and Game Code describe regulations pertaining to protection of certain wildlife species. For example, Code Section 2000 prohibits take of any bird, mammal, fish, reptile, or amphibian except as provided by other sections of the code.

The California Fish and Game Code Sections 3503, 3513, and 3800 (and other sections) protect native birds, including their nests and eggs, from all forms of take. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered take by CDFW. Raptors (i.e., eagles, hawks, and owls) and their nests are specifically protected in California under Code Section 3503.5. Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.”

Bats and other non-game mammals are protected by California Fish and Game Code Section 4150, which states that all non-game mammals or parts thereof may not be taken or possessed except as provided otherwise in the code or in accordance with regulations adopted by the commission. Activities resulting in mortality of nongame mammals (e.g., destruction of an occupied nonbreeding bat roost, resulting in the death of bats), or disturbance that causes the loss of a maternity colony of bats (resulting in the death of young), may be considered take by CDFW.

c. Local Regulations

City Of Watsonville 2005 General Plan

The Watsonville 2005 General Plan, adopted May 24, 1994, provides the following goals, policies and implementation measures pertaining to biological resources that are relevant to this analysis:

Environmental Resource Management Element

- **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 their scenic and scientific value.
- **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.
 - **Implementation Measure 9.A.2, Landscape Restoration:** The City shall require landscape restoration with native plants from regional seed stocks on sites disturbed by urban development.
- **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.
 - **Implementation Measure 9.E.1, Vegetation:** The City shall require that removal of vegetation from a site be limited to the area required for building, and that all exposed soils be provided with new vegetation prior to project completion.
 - **Implementation Measure 9.E.3, Wetland Protection:** The City shall require that new construction on slopes leading toward sloughs and wetlands, maintain an undisturbed protective buffer between all cut and fill slopes and the riparian zone.
 - **Implementation Measure 9.F.1, Habitat Protection:** Impacts to important wildlife habitat areas shall be identified as part of the City's development review and environmental review processes, and appropriate mitigations shall be considered. Mitigation measures to be considered include: designation of sensitive areas as open space, restriction of new development on lands that provide important wildlife habitat, setback requirements, habitat conservation plans, and habitat mitigation banking. Lands within the urban limit line that provide important wildlife habitat include, but are not limited to the following:
 - a. Riparian Corridors
 - b. Fresh Water Marshes and Sloughs
 - c. Woodlands and Steep Slopes.
 - **Implementation Measure 9.F.4, Fish and Game Consultation:** The City shall refer development proposals to the California Department of Fish and Game for its recommendations on conservation measures for native plant communities, riparian vegetation, wildlife habitat, and wetland preservation.

City of Watsonville Tree Protection Policies

The City has jurisdiction over all trees growing along public streets (WMC Chapter 7-11). Trimming and removing these “protected” trees requires authorization through a permit issued by the Director of Public Works. In addition, an individual tree or a cluster of trees with special character, historical, and/or aesthetic value may be designated as a “historical” via a resolution of either the City Council or Planning Commission.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

The DWSP is a planning document to guide development; it does not propose specific development projects. Therefore, the following discussions provide program-level review of the potential aesthetic impacts that could result from implementation of the DWSP. This analysis is based on biologists' assessment of how development envisioned in the DWSP could or would impact existing biological resources, based on the results of data collected during the literature review and evaluation of database query results described in Section 4.3.1.

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant environmental effects on biological resources if it would:

- 1) 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;
- 2) 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;
- 3) 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;
- 4) 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;
- 5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;
- 6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Initial Study (Appendix A) found that the DWSP would have no impacts related to conflicts with habitat conservation plans because there are no such adopted plans applicable to the plan area. Therefore, Threshold 6 is not analyzed further in this section.

b. Project Impacts and Mitigation Measures

Threshold 1: 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?

Impact BIO-1 PROJECT ACTIVITIES COULD DISTURB KNOWN SPECIAL STATUS SPECIES OR THEIR ASSOCIATED HABITAT, INCLUDING MIGRATORY NESTING BIRDS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH IMPLEMENTATION OF MITIGATION.

As discussed in Section 4.3.1, Santa Cruz tarplant is the only special status species with potential to occur within the plan area. Suitable habitat for the species, although poor in quality, may exist

within the plan area, such as vacant areas or landscaped areas not routinely maintained. Construction of the development envisioned in the DWSP would require grading, excavation, and other typical activities that disturb or cover the ground surface. Accordingly, these activities would have the potential to destroy or otherwise harm Santa Cruz tarplant, if present. Impacts would be potentially significant and require mitigation.

Development in the plan area may involve the removal of existing trees and other vegetation that may be used by native resident or migratory birds as nesting habitat. Construction disturbance during the breeding season (February 1 through August 31, for most species) could result in the incidental loss of eggs or nestlings, either directly through the destruction or disturbance of active nests or indirectly by causing the abandonment of nests. Even if nests themselves are not removed, impacts such as noise and sustained human presence in proximity to active nests can disrupt nesting behavior and cause nest abandonment and failure. Disturbance or destruction of active bird nests from construction would be a potentially significant impact.

Mitigation Measures

The following mitigation measures are required to reduce potential construction impacts on Santa Cruz tarplant and nesting birds.

BIO-1 Pre-Disturbance Santa Cruz Tarplant Survey and Mitigation Planting

Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping within the plan area, a focused survey for Santa Cruz tarplant shall be conducted by a qualified biologist in areas where a qualified biologist identifies suitable habitat. The survey shall be conducted during the species' blooming period (May-November), and findings of the survey shall be submitted to the City of Watsonville for review and approval.

If a population of Santa Cruz tarplant is found, mitigation for the loss of individuals shall be conducted. Mitigation shall be achieved by establishing a new population of Santa Cruz tarplant in an area approved by the USFWS and CDFW. This area shall not be developed and shall contain suitable habitat types for establishing a new population. Mitigation shall be a 1:1 ratio (impact mitigation) of plant establishment on an acreage basis.

Monitoring of the new mitigation population shall occur annually. Annual monitoring shall include quantitative sampling of the Santa Cruz tarplant population to determine the number of plants that have germinated and set seed. This monitoring shall continue annually or until success criteria have been met; once annual monitoring has documented that a self-sustaining population of this annual species has been successfully established on site, this mitigation measure shall be determined to have been met and the project applicant released from further responsibility.

Establishment of the plant population shall be subject to a Habitat Mitigation and Monitoring Plan. To ensure the success of mitigation sites required for compensation of permanent impacts on Santa Cruz tarplant, the project applicant for specific development projects in the plan area for which this mitigation measure applies shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan. The Habitat Mitigation and Monitoring Plan shall be submitted to the City of Watsonville for review and approval prior to the start of construction. The Habitat Mitigation and Monitoring Plan shall include, at a minimum, the following information:

- A summary of habitat and species impacts and the proposed mitigation for each element
- A description of the location and boundaries of the mitigation site(s) and description of existing site conditions

- A description of any measures to be undertaken to enhance (e.g., through focused management) the mitigation site for special-status species
- Identification of an adequate funding mechanism for long-term management
- A description of management and maintenance measures intended to maintain and enhance habitat for the target species (e.g., weed control, fencing maintenance)
- A description of habitat and species monitoring measures on the mitigation site, including specific, objective performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. Monitoring will document compliance with each element requiring habitat compensation or management. At a minimum, performance criteria will include a minimum 1:1 mitigation ratio for the number of plants in the impacted population (at least one plant preserved for each plant impacted).
- A contingency plan for mitigation elements that do not meet performance or final success criteria within described periods; the plan will include specific triggers for remediation if performance criteria are not met and a description of the process by which remediation of problems with the mitigation site (e.g., presence of noxious weeds) will occur
- A requirement that the project proponent will be responsible for monitoring, as specified in the Habitat Mitigation and Monitoring Plan, for at least three (3) years post-construction; during this period, annual reporting will be provided to the City's Supervising Environmental Planner. At the request of CDFW or USFWS, the annual reporting shall also be provided to these agencies.

BIO-2 Nesting Bird Avoidance

To the extent feasible, construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in Santa Cruz County extends from February 1 through August 31. If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of construction activities and shall be conducted prior to tree removal, tree trimming, or other vegetation clearing. During the survey, the biologist shall inspect all trees and other potential nesting habitats, including trees, shrubs, ruderal grasslands, and buildings in and immediately adjacent to the impact areas for nests.

If an active nest is found sufficiently close to work areas to be disturbed by these activities, the biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the Migratory Bird Treaty Act and CFGC shall be disturbed during project implementation.

Significance After Mitigation

With implementation of mitigation measures BIO-1 and BIO-2, potential impacts to special status plant species and nesting birds would be less than significant.

Threshold 2: 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?

Impact BIO-3 THE PROJECT WOULD NOT 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. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The plan area does not include riparian habitat, or other sensitive natural communities, nor is the plan area within 50 feet of riparian habitat or sensitive natural communities. The Pajaro River and its associated riparian zone south of the plan area boundary and beyond 50 feet away. While the DWSP does not include or envision development outside of the plan area boundary, development within the plan area could have indirect effects that extend beyond the boundary, especially where development occurs immediately adjacent to the plan area boundary. For example, exterior lighting on new development can extend beyond the perimeter of the development property, and lighting could impact riparian habitat where it occurs near the plan area boundary, such as along the Pajaro River. However, Chapter 6 of the DWSP requires that site lighting be shielded by permanent attachments to light fixtures. Chapter 6 of the DWSP also contains requirements that would restrict how bright or intense light fixtures could be depending on whether the fixture is used for residential structures or commercial/industrial structures. These DWSP requirements would prevent light pollution from impact riparian habitat outside of the plan area.

Based on the lack of riparian habitat or other sensitive natural communities within the plan area, as well as DWSP requirements limiting off-site light pollution, impacts to riparian habitat or other sensitive natural communities would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3: 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?

Impact BIO-4 THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON STATE OR FEDERALLY PROTECTED WETLANDS. THERE WOULD BE NO IMPACT.

There are no State or federally protected wetlands within or adjacent to the plan area. The DWSP would have no impact to these resources.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

There would be no impact.

Threshold 4: 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?

Impact BIO-5 THE PROJECT WOULD NOT SUBSTANTIALLY IMPEDE WILDLIFE MOVEMENT AREAS OR NATIVE WILDLIFE NURSERY SITES. THERE WOULD BE NO IMPACT.

The plan area does not include recognized Natural Landscape Blocks or Essential Connectivity Areas. Existing development in the plan area likely deters wildlife movement through the plan area. Most of the plan area consists of city blocks surrounded by roadways on all sides. Future development envisioned in the DWSP would occur within and among existing development in the downtown area where no wildlife corridors or wildlife nursery sites exist. Therefore, no impacts to wildlife movement areas or wildlife nursery sites would occur from implementation of the DWSP.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

There would be no impact.

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
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Impact BIO-6 TREE REMOVAL ASSOCIATED WITH POTENTIAL PROJECT ACTIVITIES COULD RESULT IN DAMAGE OR DESTRUCTION OF PROTECTED TREES. HOWEVER, COMPLIANCE WITH THE WATSONVILLE MUNICIPAL CODE WOULD ENSURE THAT IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The plan area contains trees protected by Watsonville Municipal Code Chapters 7-11 and 13-7. The DWSP envisions development that would require the removal of some of these trees. For example, the modifications to Main Street envisioned in the DWSP would involve changing the number of travel lanes and widening pedestrian sidewalks. These activities would likely require the removal of street trees, which are protected by the Watsonville Municipal Code. Another example of how the DWSP might impact protected trees is from construction damage during development of commercial or residential uses. Building construction would require excavation, which could sever root systems of nearby trees, resulting in the partial or complete death. However, project activities would require compliance with the City's regulations, including obtaining tree removal permits that require replacement of removed native and landscaped trees. For example, Section 13-7.32 requires the preservation of trees measuring at least 6 inches in diameter during construction activities in Watsonville to the extent feasible. Trees that must be removed must be replaced at a ratio determined appropriate by the City's Community Development Director. The DWSP also includes requirements for landscaping, including tree planting. For example, Section 3.2 of the DWSP calls for a carefully selected palette of street trees to be planted in the plan area. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

c. Cumulative Impacts

The cumulative impact assessment area for biological resources in the area within the city limits of Watsonville. This is an appropriate geographical area for this cumulative impact assessment because the DWSP would occur entirely in the downtown area of Watsonville and not affect regional wildlife or plant populations beyond the city limits.

The cumulative impacts assessment area is mostly developed with urban to suburban uses, as well as commercial, industrial, and civic uses. This existing urban development has resulted in the reduction of native plant and wildlife species and habitats. However, some reasonably foreseeable future development would result in impacts to biological resources. For example, the reasonably foreseeable Hillcrest Subdivision Project would result in impacts to wetlands along the Watsonville Slough, which provides habitat for wildlife and occurs in a more suburban area of the City outside of the plan area. Other reasonably foreseeable future projects in the cumulative impacts assessment area, such as the Freedom Campus Master Plan, would require the removal of street trees and other native trees in landscaped settings. Although these landscape settings do not provide habitat for special-status species, they could be used as nesting sites by migratory nesting birds. Therefore, the reasonably foreseeable future projects in the cumulative impact assessment area would have significant cumulative impacts on biological resources, including special-status species, wetlands and riparian zones, trees, and nesting birds.

Santa Cruz tarplant is the only special-status species with potential to occur within the plan area, and therefore the only special-status species that could be potentially impacted from implementation of the DWSP. Additionally, development envisioned in the DWSP could impact nesting migratory birds or their nests, which would combine with the cumulative impacts to nesting birds. With implementation of the mitigation measures described in Section 4.3.3, the DWSP would not result in a cumulatively considerable contribution to impacts on these special-status species or nesting birds. New development within the plan area would not result in the degradation of sensitive habitats including riparian and wetland areas because they do not occur within the plan area; therefore, the proposed DWSP would not result in a cumulatively considerable contribution to impacts on these resources or contribute to cumulative impacts on these resources. The plan area does not support wildlife movement or nurseries within its boundary; therefore, the proposed project would not result in a cumulatively considerable contribution to this resource or contribute to significant cumulative impacts. Relevant policies and regulations would apply to development within the plan area and provide protection for these resources under existing conditions; therefore, the proposed DWSP would not result in a cumulatively considerable contribution to these resources. Development within the plan area would occur within the existing urban buffer and would not result in a cumulatively considerable contribution on biological resources in the region.

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4.4 Cultural Resources

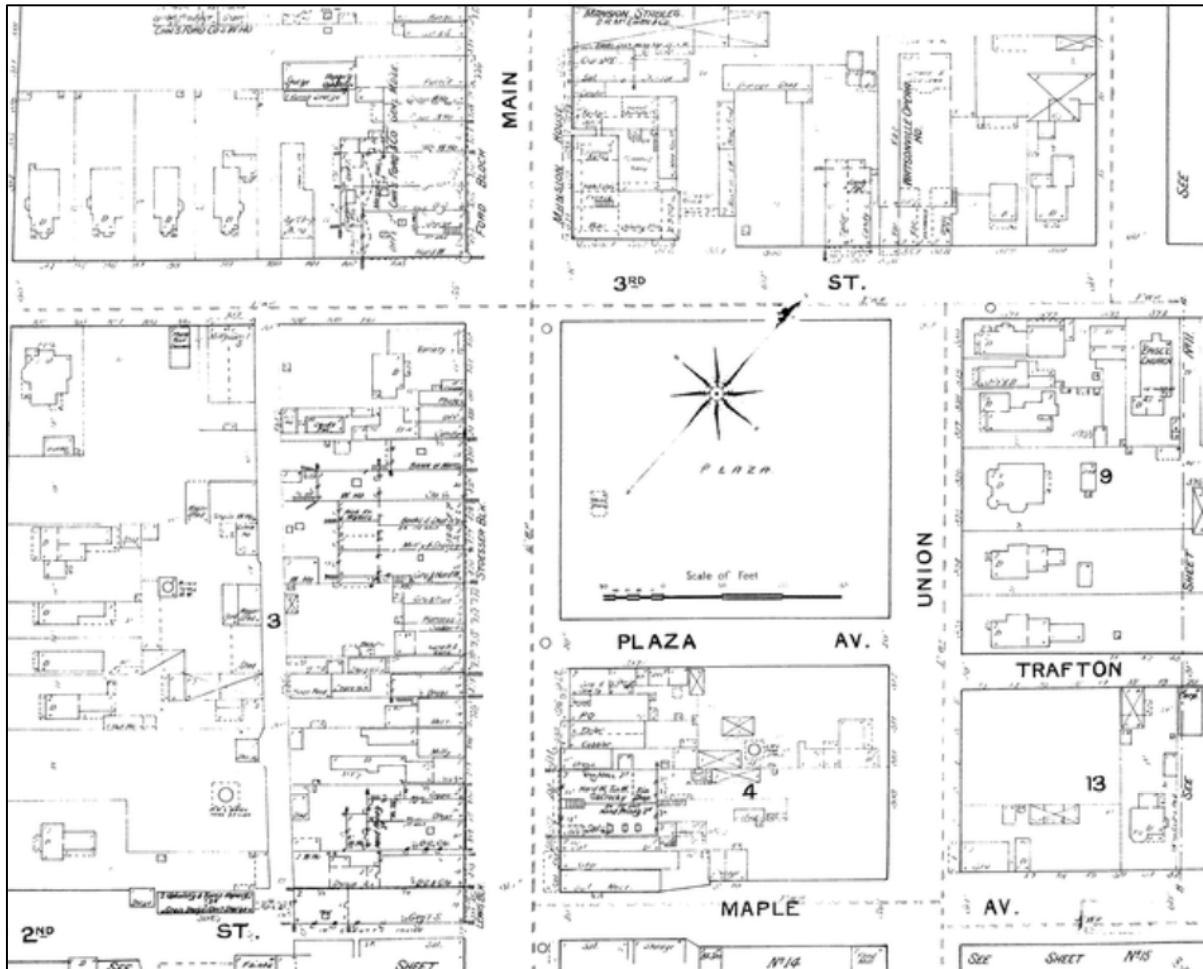
This section describes the cultural resources settings and regulations applicable to the plan area and assesses the potential impacts on cultural resources that may result with implementation of the proposed DWSP. The impacts analysis in this section supported by the *Watsonville Downtown Specific Plan Area Historic Resources Survey Report* (Survey Report; Appendix D). This section focuses primarily on historic-era cultural resources. Prehistoric-era cultural resources are discussed in more detail in the Initial Study (Appendix A).

4.4.1 Setting

Please see the Survey Report (Appendix D) for a full historic context of the City of Watsonville. An abbreviated context of the DWSP plan area is provided below to support the analysis that follows.

The plan area comprises Watsonville's commercial core, some of the community's oldest residential neighborhoods, and the northeastern fringe of its main warehouse and industrial district. Sanborn Fire Insurance maps show that the current patterns of commercial and residential development were established more or less by the 1880s (Figure 4.4-1). The 1886 edition of the Sanborn map shows that the Main Street corridor was already predominantly commercial, with a notable concentration of businesses located near the plaza, on Main, Peck and Beach streets and Maple Avenue. Industrial development was limited, but included packing, milling, and warehouse operations and the Watsonville Brewery, clustered around Main Street. By the time the 1888 edition was surveyed, there were significant neighborhoods of single-family homes around the intersection of Beach and Rodriguez Streets and north of Union and Brennan Streets. Chinatown was located at the southeast corner of Union Street and Maple Avenue. Through the late nineteenth century, institutional properties, including the Watsonville Opera House and at least two public schools, were located centrally in the commercial core or in bordering residential areas. Development northwest of Ford Street was limited by "un-reclaimed swamp land." By 1892, Walker Street was constructed along the Southern Pacific Railroad tracks. Walker Street had yet to assume its current industrial character, however, and was sparsely lined with residences. Martinelli's Ciderworks (on Beach Street near the intersection with Marchant) supported a growing neighborhood of single-family dwellings.

Figure 4.4-1 1892 Sanborn Map of City Plaza and Immediate Surroundings



Watsonville's rapid population growth in the 1890s fueled development throughout the City, including the new sections of the DWSP plan area. By 1902, the Main Street corridor expanded north to Freedom Boulevard (formerly known as Santa Cruz Road). Development in this area included St. Patrick's Catholic Church (just outside the DWSP plan area), Stoesser's cement plant near the intersection of Main and Ford streets, and several residences along both sides of Main Street. A large area between Main and Rodriguez streets east of Sixth Street experienced increasingly dense residential development, while a growing number of homes and cottages were built in the area bounded by Rodriguez, Walter, Second, and Fourth streets. These were likely constructed in conjunction with the early development of the industrial district that emerged to the south, along Walker Street. A box factory, feed mill, vinegar distillery, and several warehouses appeared on, or just off, Walker Street by the early twentieth century. By the time the survey was conducted for the 1920 Sanborn map warehousing dominated the northside of Walker Street. The densification of existing residential and commercial areas and the construction of a few scattered institutional properties made up much of the remainder of development carried out between 1902 and 1920. By the late 1930s, historic aerial photos show, the DWSP plan area was nearly completely developed (Figure 4.4-2).



Figure 4.4-2 1935 Aerial Photograph of Downtown Watsonville





Available sources offer little evidence of new development until after World War II. The DWSP plan area was essentially entirely developed by this time, and most new construction involved the redevelopment of properties and the realignment of some streets on the City's irregular grid. Sanborn maps and historic aerial photographs show that a number of properties on the southeast side of the City were razed to accommodate the construction of Riverside Drive, which created a thoroughfare for Highway 129. Between 1968 and 1982, Brennan and Rodriguez Streets were both realigned between Beach Street and Lake Avenue. The realignment work involved the demolition of several buildings, mostly commercial and residential buildings (Netronline 1968; 1981; 1982). The destructive Loma Prieta Earthquake of 1989 led to the loss of multiple buildings in downtown Watsonville, including the National Register-listed Stoesser Block and Annex at 331-341 Main Street. Much of the redevelopment that took place after World War II centered on Main Street, especially between Maple Avenue and the Pajaro River. Unfolding over several decades, this redevelopment included the construction of large institutional buildings—such as City Hall, the Civic Plaza building and a new post office—and several new commercial and residential properties located west of the Pajaro River. Additionally, over the last decade, several historic-period commercial buildings formally located on Main Street, in particular between Riverside Drive and 2nd Street, were demolished and redeveloped with commercial buildings that house establishments such as McDonalds and a gas station.




The analysis summarized in the Survey Report identified three potential historical resource types within the DWSP plan area: designated historical resources, potentially eligible individual historical resources, and groupings of properties which may constitute historic districts or overlay/conservation zones pending further study. The designated historical resources, of which 13 were identified in the Survey Report, are designated or eligible for listing in a federal, state and/or local historic register and are therefore considered historical resources pursuant to CEQA (see Table 4.4-1). The potentially eligible individual historical resources identified by the Survey Report (77) and groupings of properties identified by the Survey Report (4), are those which have potential architectural and/or historical significance and therefore have an increased potential to qualify as historical resources pursuant to CEQA pending further study. In addition, the DWSP plan area contains additional buildings and structures that are 45 or more years of age and therefore have the potential to qualify as a historical resource as defined by CEQA.

Table 4.4-1 Known Designated Resources Within the DWSP Plan Area




Map Number	Resource Name/Location	Architectural Style/ Associated Architect	Date of Construction	Designation	Photograph
1	Watsonville Woman's Club 12 Brennan Street	Tudor Revival Frank Wyckoff, Architect	1917	Listed in the Watsonville HR	
2	"Judge" Julius Lee House/Lewis Home 128 East Beach Street	Queen Anne Victorian William Weeks, Architect	1884	Listed in the NRHP, CRHR and the Watsonville HR	




City of Watsonville
Downtown Watsonville Specific Plan

Map Number	Resource Name/Location	Architectural Style/ Associated Architect	Date of Construction	Designation	Photograph
3	Tyler/Ash House 225 East Lake Avenue	Queen Anne Victorian William Weeks, Architect	1890s	Listed in the Watsonville HR	
4	Porter Building 280 Main Street	Classical Revival William Weeks, Architect	1903	Listed in the Watsonville HR (located on City Hall property)	

Map Number	Resource Name/Location	Architectural Style/ Associated Architect	Date of Construction	Designation	Photograph
5	Wells Fargo Building 326 Main Street	Art Deco H.H. Winner, Architect	1940	Determined eligible for listing in the NRHP (2S2)	
6	Lettunich Building 406 Main Street	Renaissance Revival/Chicago Style William Weeks, Architect	1911	Listed in the NRHP, CRHR and the Watsonville HR	
7	Mansion House Hotel 418-428 Main Street	Second Empire Thomas Beck, Architect	1871	Listed in the NRHP, CRHR and the Watsonville HR	

City of Watsonville
Downtown Watsonville Specific Plan

Map Number	Resource Name/Location	Architectural Style/ Associated Architect	Date of Construction	Designation	Photograph
8	Kalich Building 426-434 Main Street	Renaissance Revival William Weeks, Architect	1914	Listed in the Watsonville HR	
9	Watsonville City Plaza Bounded by Main, Peck, Union, and East Beach Streets	William Weeks, Architect (bandstand)	1906 (bandstand)	Listed in the NRHP, CRHR and the Watsonville HR	
10	318 Union Street	Spanish Colonial Revival Lorimer Rich, Architect	1937	Determined eligible for listing in the NRHP (2S2)	

Map Number	Resource Name/Location	Architectural Style/ Associated Architect	Date of Construction	Designation	Photograph
11	Resetar Hotel 15 West Lake Avenue	Spanish Colonial William Weeks, Architect	1927	Determined eligible for listing in the NRHP (2S2)	
12	26 West Beach Street	Neoclassical Revival William Weeks, Architect	1911	Listed in Watsonville HR	
13	Jefsen Hotel 6 East Lake Avenue	Italianate	1920-1907	Listed in Watsonville HR	

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

Properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR and are therefore considered historical resources per CEQA. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- Criterion A:** Are associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B:** Are associated with the lives of persons significant in our past
- Criterion C:** Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D:** Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

- Location:** The place where the historic property was constructed or the place where the historic event occurred
- Design:** The combination of elements that create the form, plan, space, structure, and style of a property
- Setting:** The physical environment of a historic property
- Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property
- Workmanship:** The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
- Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time
- Association:** The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general

estimate of the time needed to develop the necessary historical perspective to evaluated significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have “exceptional importance” to be considered eligible for NRHP listing.

Archaeological Resources Protection Act of 1979

This regulation was enacted to protect archaeological resources and sites that are on public lands and tribal lands, to foster increased cooperation and exchange of information between government representatives, the professional archaeological community, and private individuals. Section 4 of the statute and Sections 16.5-16.12 of the uniform regulations describe the requirements that must be met before federal authorities can issue a permit to excavate or remove any archaeological resource on federal or tribal lands. The curation requirements of artifacts, other materials excavated or removed, and the records related to the artifacts and materials are described in Section 5 of the Archaeological Resources Protection Act of 1979. This section also authorizes the Secretary of the Interior to issue regulations describing in more detail the requirements regarding these collections.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act established federal policy to protect and preserve the inherent rights of freedom for Native groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

b. State Regulations

California Environmental Quality Act

California Public Resources Code (PRC) Section 21804.1 requires lead agencies determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or cultural significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a “unique archaeological resource” as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources would be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines §15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines §15064.5[b][2][A]).

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC §21083.2[a], [b]).

Section 15126.4 of the CEQA Guidelines stipulates an EIR shall describe feasible measures to minimize significant adverse impacts. In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC §§5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better

reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2006). Further, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2006). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

Properties are eligible for listing in the CRHR if they meet one of more of the following criteria:

- Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- Criterion 2:** Is associated with the lives of persons important to our past
- Criterion 3:** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history

c. Local Regulations

City of Watsonville Historic Preservation Ordinance

Chapter 8-13 of the City of Watsonville's municipal code authorizes the City Council, by ordinance, to designate structures, features, or integrated groups of structures and features on a single lot or site as "historic structures" if they have special character, or historical, architectural, or aesthetic interest (Municipal Code Chapter 8-13, Section 8-13.02[a]). "Historic structures" are further defined in Chapter 9-2, Section 9-2.200 as:

1. Listed individually in the NRHP (a listing maintained by the Department of the Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the NRHP
2. Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary of Interior to qualify as a registered historic district
3. Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of Interior or
4. Individually listed on a local inventory of historic places

Alterations to historic structures as defined above is subject to review by the Planning Commission and Section 8-13.12 of Chapter 8-13 of the municipal code, which states:

The Planning Commission shall be guided by the standards set forth in this section in its review of permit applications for work or change of conditions on a historical structure. In appraising the effects and relationships established herein, the Planning Commission in all cases shall consider the factors of architectural style, design, arrangement, texture, materials and color, and any other pertinent factors.

- a. The proposed work shall be appropriate for and consistent with the effectuation of the purposes of this chapter and shall preserve or enhance the characteristics and particular features specified in the designating ordinance.
- b. The proposed work shall not adversely affect the exterior architectural features of the structure and, where specified in the designating ordinance for a publicly owned structure, its major interior architectural features; nor shall the proposed work adversely affect the special character or special historical, architectural, or aesthetic interest or value of the structure and its site, as viewed both in themselves and in their setting.

City of Watsonville 2005 General Plan

The Watsonville 2005 General Plan Environmental Resources Element includes the following goals, policies, and implementation measures pertaining to cultural resources that are relevant to this analysis:

Environmental Resource Management Element

- **Policy 9.H Archaeological Resources:** The City shall foster and provide for the preservation of cultural resources and artifacts of historic and prehistoric human occupation within the Pajaro Valley.
 - **Implementation Measure 9.H.1, Inventory:** The City shall maintain an inventory of historic and prehistoric sites, structures, and landmarks of historic and cultural significance in order to determine the potential impacts on these resources from proposed projects.
 - **Implementation Measure 9.H.2, Protection Measures:** The City shall notify the Regional Office, California Archaeological Site Survey, and the Ohlone Indian Cultural Association of projects within identified archaeological sensitive areas. An archaeological site survey by a professional archaeologist may also be required.
 - **Implementation Measure 9.H.3, Project Conditions:** The City shall require appropriate land use controls on projects that may endanger or destroy historic and prehistoric artifacts. Such controls include additional of fill to prevent disruption of site by grading, and site planning to avoid disturbance on sensitive portions of the site.
 - **Implementation Measure 9.H.4, Private Participation:** The City shall foster and encourage private efforts to preserve historic sites and cultural artifacts.
 - **Implementation Measure 9.H.5, Ordinance:** The City shall enforce the historic preservation ordinance.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

The State Legislature, in enacting the CRHR, amended CEQA to clarify which properties are significant, as well as which project impacts are considered significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment (CEQA Guidelines Section 150645[b]). A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 150645[b][1]).

The CEQA Guidelines further state that “[t]he significance of an historical resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in the California Register ... local register of historic resources... or its identification in an historic resources survey.” As such, the test for determining whether or not the project will have a significant impact on identified historic resources is whether it will materially impair physical integrity of the historic resource such that it could no longer be listed in the CRHR or a local landmark program.

In accordance with Appendix G of the *State CEQA Guidelines*, the proposed project would result in potentially significant environmental effects on cultural resources if it would:

- 1) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5;
- 2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- 3) Disturb any human remains, including those interred outside of formal cemeteries.

Potential impacts of the DWSP to archaeological resource pursuant to CEQA §15064.5 were analyzed in the Initial Study (Appendix A), which indicated that the DWSP plan area has high sensitivity for archaeological resources and that future development facilitated by the DWSP would have the potential to result in archaeological adverse change in the significance of archaeological resources. As presented in the Initial Study, Mitigation Measures CUL-1, CUL-2, and CUL-3 would apply to future construction facilitated by the project, thereby reducing impacts to archaeological resources to a less than significant level. Accordingly, threshold 2 is not studied further in this section of the EIR. Likewise, the Initial Study concluded impacts related to disturbance of human remains would be less than significant. Accordingly, Threshold 3 is not studied further in this section of the EIR.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 DEVELOPMENT ENVISIONED IN THE DWSP COULD ADVERSELY AFFECT KNOWN AND PREVIOUSLY UNIDENTIFIED HISTORICAL RESOURCES. IMPACTS TO HISTORICAL RESOURCES WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Development under the proposed project could impact historical resources through construction activities associated with buildout. The DWSP has a future land use scenario that emphasizes infill development in existing urbanized areas of downtown. Because future infill development could be located near or adjacent to existing historic structures, the integrity of such structures could be indirectly or directly impacted as a result. For example, future infill development could consist of modern-style architecture, which if located near a historic building, could adversely change the historic context or setting in which the historic building occurs. Moreover, if future infill development would involve redevelopment/demolition of existing structures, it is possible that such structures could have historical significance (as determined by site specific evaluation) given the presence of structures that are over 50 years old within the plan area. Redevelopment or demolition could result in the permanent loss of or permanent adverse changes to historic structures. For

example, redevelopment could replace the architectural elements of a building that contribute toward its historic designation. Impacts would be potentially significant, and mitigation is required.

Mitigation Measures

CUL-1(a) Historical Resources Evaluation

During the planning phase for projects and development envisioned in the DWSP, and prior to permit approval for said projects and development, the City shall confirm the presence of historical resources with the potential to be impacted by the particular project or development. If the property on which the project or development is proposed is not currently designated but contains built environment features over 45 years of age, a historical resources evaluation shall be prepared by an architectural historian or historian who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in architectural history or history (36 Code of Federal Regulations Part 61). The qualified architectural historian or historian shall conduct an intensive-level survey and perform the historical evaluation in accordance with the guidelines and best practices promulgated by the California Office of Historic Preservation (OHP). Properties shall be evaluated within their historic context and documented in a report meeting the California OHP guidelines. All evaluated properties shall be documented on California Department of Parks and Recreation Series 523 Forms. The report with attached DPR forms shall be submitted to the City for review and concurrence.

CUL-1(b) Compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties

If it is determined that a proposed project site located in the DWSP plan area contains a historical resource, efforts shall be made to avoid impacts as feasible. Any relocation, rehabilitation, or alteration of a resource shall be implemented consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (the Standards). Application of the Standards shall be overseen by a qualified architectural historian or historical architect meeting the SOI PQS in architectural history or history (36 Code of Federal Regulations Part 61). In conjunction with any development application that may impact a historical resource, a report identifying and specifying proposed construction activities and the treatment of character-defining features shall be provided to the city for review and concurrence, in addition to the historical resources evaluation required by CUL-4.

CUL-1(c) Historical Resource Documentation

If historical resources are identified on a proposed project site located in the DWSP plan area and compliance with Mitigation Measure CUL-1(b) and/or avoidance is not feasible, the project applicant or developer shall provide a report explaining why compliance with the Standards and/or avoidance is not feasible for the City's review and approval. Site-specific mitigation measures shall be established and undertaken, including, but not limited to, documentation of the historical resource in a Historic American Buildings Survey (HABS) or HABS-like report. If a HABS or HABS-like report is proposed, it shall be commissioned by the project applicant or their consultant to comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation (Federal Register Vol. 48, No. 190, pp. 44730-34) and shall generally follow the Historic American Buildings Survey Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. The documentation shall be completed by a qualified architectural historian or historian who meets the SOI PQS in architectural history or

history (36 Code of Federal Regulations Part 61) and submitted to the City prior to issuance of permits for the demolition or alteration of the historical resource.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1(a), CUL-1(b), and CUL-1(c) would reduce impact to historical resources to the extent feasible. However, impacts would remain significant and unavoidable because development within the plan area could still adversely affect historic properties. For example, development envisioned in the DWSP could result in entire demolition of a historic building.

c. Cumulative Impacts

IMPACT CUL-C1: THE DWSP WOULD HAVE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO A SIGNIFICANT CUMULATIVE IMPACT ON HISTORIC-ERA CULTURAL RESOURCES.

The cumulative impact analysis area for cultural resources consists of the plan area and the city of Watsonville, based on the historic, ethnographic, and prehistoric period use patterns of the region. This is appropriate because cultural resources identified in this larger region will be similar in type and style to those that are or may be present in the plan area.

The reasonably foreseeable future projects in the cumulative impact assessment area (see Table 3-1 in Section 3, *Environmental Setting*) would involve construction activities that require ground disturbance. For example, these projects could require trenching for utility connections or grading to prepare the site for pouring foundations. These types of construction activities would therefore have potential to impact both known or previously unknown prehistoric cultural resources. The cumulative impact would be potentially significant.

The DWSP also envisions development that would require ground disturbance. The plan area is mostly developed. Because of this, the potential to encounter the same prehistoric resources as the other reasonably foreseeable future projects would be minimized. Additionally, the physical distance separating the plan area from reasonably foreseeable future projects would also reduce the potential for the DWSP to impact the same archaeological resources as these foreseeable projects. Implementation of the DWSP would also require implementation of the mitigation measures identified in the Initial Study, including CUL-1, CUL-2, and CUL-3. With implementation of these mitigation measures, the DWSP would not have a cumulatively considerable contribution toward a significant impact on prehistoric-era cultural resources.

Historic-era cultural resources are typically site specific. For example, a designated historic building typically occurs on a single property. While most cultural resources are site specific, with impacts that are project specific, others may have regional significance; for example, a historic structure that represents the last known example of its kind would constitute a regional impact. Additionally, development near a historic resource could change the context of the landscape, which would also adversely impact the historic resource. The reasonably foreseeable future projects in the cumulative impact assessment area would have potential to result in these changes to historic resources. Cumulative impacts on historic-era cultural resources would be significant.

Mitigation Measures CR-1(a), CR-1(b), and CR-1(c) would reduce impacts associated with DWSP projects through impact minimization for historical resources. However, the plan area contains historic-era resources that could be substantially and adversely changed by the development envisioned in the DWSP, even with implementation of CR-1(a) through CR-1(c). Therefore, the

DWSP would have a cumulatively considerable contribution to a significant cumulative impact on historic resources.

4.5 Hazards and Hazardous Materials

This section describes the existing setting and regulatory framework pertaining to hazards and hazardous materials. This section also evaluates potential impacts from hazards and hazardous materials from the proposed DWSP.

4.5.1 Setting

a. Terminology

Hazardous Waste

The United States Environmental Protection Agency (USEPA) defines a “hazardous waste” as a substance that: (1) may cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness, and (2) poses a substantial present or potential future hazard to human health or the environment when it is improperly treated, stored, transported, disposed of, or otherwise managed (40 Federal Code of Regulations (CFR) 261.10). Hazardous waste is also defined as ignitable, corrosive, explosive, or reactive and is identified by the USEPA by its form: solids, semi-solids, liquids, and gases. Producers of such wastes include private businesses and federal, State, and local government agencies. A material may also be classified as hazardous if it contains defined amounts of toxic chemicals. USEPA regulates the production and distribution of commercial and industrial chemicals to protect human health and the environment. USEPA also prepares and distributes information to inform the public about these chemicals and their effects, and provides guidance to manufacturers in pollution prevention measures, such as more efficient manufacturing processes and recycling used materials.

Hazard versus Risk

Public health is potentially at risk whenever hazardous materials have been used or where there could be exposure to such materials. Ecological communities, such as avian and terrestrial habitats and the aquatic environment, may be at risk, depending on the type of populations and locations relative to potential exposure sources. Important to the setting and analyses presented in this section are the concepts of the “hazard” of these materials and the “risk” they pose to human health and the environment.

Exposure to some chemical substances may harm internal organs or systems in the human body, ranging from temporary effects to permanent disability or death. Aquatic, terrestrial, or avian species may be similarly adversely affected. Hazardous materials that result in adverse effects are generally considered toxic. However, chemical materials may be corrosive or react with other substances to form other hazardous materials, but they are not considered toxic because organs or systems are not affected. Because toxic materials can result in adverse health effects, they are considered hazardous materials, but not all hazardous materials are necessarily toxic. For example, some hazardous materials are flammable but not necessarily toxic to human health. For purposes of the information and analyses presented in this section, the terms hazardous substances and hazardous materials are used interchangeably and include materials that are considered toxic.

The risk to human health and the ecological environment is determined by the probability of exposure to a hazardous material and the severity of harm such exposure would pose. The likelihood and means of exposure, along with the inherent toxicity of a material, are used to

determine the degree of risk to human health or the ecosystem. For example, a high probability of exposure to a low toxicity chemical would not necessarily pose an unacceptable human health or ecological risk, whereas a low probability of exposure to a very high toxicity chemical could. Various regulatory agencies, such as USEPA, California Environmental Protection Agency (CalEPA), State Water Resources Control Board, California Department of Toxic Substances Control (DTSC), and federal and State Occupational Safety and Health Administrations (OSHA) are responsible for developing and/or enforcing risk-based standards to protect the public and the environment.

Existing Setting

Hazardous Materials

The DWSP plan area is currently developed with a range of residential, commercial, and industrial uses, including facilities that may use hazardous materials or generate hazardous wastes such as dry cleaners, gas stations, automotive repair/service facilities, machine shops, and industrial/construction supply businesses such as a farm equipment supplier and cold storage facility. Examples of hazardous materials that could be used or stored at these types of facilities or business include motor oil, diesel fuel, hydraulic fluid, pesticides and herbicides, and perchloroethylene (dry cleaner substance).

Asbestos

Asbestos is a highly crumbly material often found in buildings constructed prior to 1979, typically used as insulation in walls or ceilings. It was formerly popular as an insulating material; however, it can pose a health risk when very small particles become airborne. Watsonville was incorporated in 1968, and some buildings in the plan date to at least 1979. Due to their age, buildings dating back to 1979 or earlier in the plan area could contain asbestos.

Pursuant to guidance issued by the Governor's Office of Planning and Research, State Clearinghouse, lead agencies are encouraged to analyze potential impacts related to naturally occurring asbestos. Naturally occurring asbestos can be released from serpentine and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. According to U.S. Geological Survey (2011), the project is not located in an area identified as having naturally occurring asbestos. However, there is potential for asbestos-containing materials (ACMs) to be present in downtown buildings.

Lead-Based Paint

Prior to the enactment of federal regulations limiting their use in the late 1970s, lead-based paint was sometimes used in residential construction. Lead is a highly toxic metal that was sometimes used in products found in and around homes and other places less relevant to the plan area, such as ships. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. The primary source of lead exposure in residences is deteriorating lead-based paint. Lead dust can form when lead-based paint is dry scraped, dry sanded or heated. Dust also forms when painted surfaces bump or rub together. Lead-based paint that is in good condition is usually not a hazard. Due to the age of some buildings in the plan area, lead-based paint is considered present with the plan area.

Hazardous Wastes

Hazardous waste is any hazardous material that is to be discarded, abandoned, or recycled. The criteria that define a material as hazardous also define a waste as hazardous. Specifically, materials and waste may be considered hazardous if they are poisonous (toxic); can be ignited by open flame (ignitable); corrode other materials (corrosive); or react violently, explode, or generate vapors when mixed with water (reactive). Soil or groundwater contaminated with hazardous materials above specified regulatory state or federal thresholds is considered hazardous waste if it is removed from a site for disposal. If handled, disposed, or otherwise handled improperly, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

4.5.2 Regulatory Setting

a. Federal Regulations

Comprehensive Environmental Response, Compensation, and Liability Act

Under the Comprehensive Environmental Response, Compensation, and Liability Act, adopted 1980, owners and operators of real estate where there is hazardous substance contamination may be held strictly liable for the costs of cleaning up contamination found on their property. No evidence linking the owner/operator with the placement of the hazardous substances on the property is required.

Clean Water Act

The Clean Water Act, adopted 1972, governs the control of water pollution in the United States. This Act is implemented through the NPDES program, which requires that permits be obtained for point discharges of wastewater. This Act also requires that stormwater discharges be permitted, monitored, and controlled for various entities.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Regulations for lead-based paint are contained in the Lead-Based Paint Elimination Final Rule 24 CFR 33, governed by the U.S. Department of Housing and Urban Development, which requires sellers and lessors to disclose known lead-based paint and lead-based paint hazards to prospective purchasers and lessees. Additionally, all lead-based paint abatement activities must comply with California and Federal OSHAs and with the State of California Department of Health Services requirements. Only personnel trained and certified in lead-based paint abatement are allowed to perform abatement activities. All lead-based paint removed from structures must be hauled and disposed of by a transportation company licensed to move this type of material to a landfill or receiving facility licensed to accept the waste.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), adopted 1976, governs and regulates the disposal of solid and hazardous waste, and the management of underground storage tanks to protect human health and the environment from potential hazardous materials. Agricultural

producers disposing of pesticide waste are exempt if they follow practice procedures in accordance with RCRA.

Toxic Substances Control Act

Toxic Substances Control Act, adopted 1976, provides the USEPA with authority to require reporting, testing, restrictions on chemical substances, and to regulate commercial chemicals when they pose an unreasonable health or environmental risk.

b. State Regulations

Department of Toxic Substances Control

As a department of the CalEPA, DTSC is the primary agency in California that regulates hazardous waste, assumes authority for clean-up of the most serious existing contamination sites, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Recovery Act and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law to regulate hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, both State and Federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires DTSC, the State Department of Health Services, the SWRCB, and the California Department of Resources Recycling and Recovery (CalRecycle) to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the State. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If soil is excavated from a site containing hazardous materials, it is considered a hazardous waste if it exceeds specific criteria in Title 22 of the CCR. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority, such as the Central Coast Regional Water Quality Control Board (RWQCB) or the County of Santa Cruz Environmental Health Division. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

The Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 26. The State program is like the Federal program under RCRA, but more stringent. This regulation lists materials that may be hazardous and establishes criteria for their identification, packaging, and disposal. Environmental health standards for management of

hazardous waste are contained in CCR Title 22, Division 4.5. As required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the state called the Cortese List.

Unified Program

CalEPA as established a unified hazardous waste and hazardous materials management regulatory program (Unified Program), as required by Senate Bill 1082 (1993). The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental programs under CalEPA, the SWRCB and the RWQCB in each region of the State, State Office of Emergency Services, and the State Fire Marshal:

- Underground Storage Tank program;
- Hazardous materials release response plans and inventories;
- California Accidental Release Prevention Program;
- Above ground Petroleum Storage Act requirements for spill prevention, control, and countermeasure plans; and
- California Uniform Fire Code hazardous material management plans and inventories.

Regional Water Quality Control Board

The Central Coast RWQCB is authorized by the Porter Cologne Water Quality Control Act of 1969 to protect the waters of the State. The RWQCB provides oversight for sites where the quality of groundwater or surface waters is threatened. Extraction and disposal of contaminated groundwater due to investigation/remediation activities or due to dewatering during construction would require a permit from the RWQCB if the water were discharged to storm drains, surface water, or land.

California Department of Pesticide Regulations, Department of Food and Agriculture, and the Department of Public Health

The California Department of Pesticide Regulations (DPR), a division of CalEPA, in coordination with the California Department of Food and Agriculture, a division of Measurement Standards, and the California Department of Public Health have the primary responsibility to regulate pesticide use, vector control, food, and drinking water safety. CCR Title 3 requires the coordinated response between the County Agricultural Commissioner and County of Santa Cruz Environmental Health Division to address the use of pesticides used in vector control for animal and human health on a local level. DPR registers pesticides, and the County tracks pesticide use. Title 22 is used also to regulate small, district systems and larger, statewide water systems.

California Department of Industrial Relations, Division of OSHA

The California Department of Industrial Relations, Division of Occupational Safety and Health Administration (Cal/OSHA), assumes primary responsibility for developing and enforcing workplace safety regulations within the State. Cal/OSHA standards are more stringent than Federal OSHA regulations and are presented in CCR Title 8. Standards for workers dealing with hazardous materials include practices for all industries (General Industry Safety Orders); specific practices are described for construction, hazardous waste operations, and emergency response. Cal/OSHA conducts on site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

California Air Toxic “Hot Spots” (AB 2588) Program

The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly, 1987: chaptered in the California Health and Safety Code Section 44300, et. al.) established a formal regulatory program for site-specific air toxics emissions inventory and health risk quantification that is managed by California air districts. Under this program, a wide variety of industrial, commercial, and public facilities are required to report the types and quantities of toxic substances their facilities routinely release into the air. The goals of the Air Toxics Hot Spots program are to collect emissions data, to identify facilities with potential for localized health impacts, to ascertain health risks, to notify nearby residents of risks that are determined to warrant such notification, and to reduce significant risks.

c. Local Regulations

City of Watsonville 2005 General Plan

The Public Safety Element of the Watsonville 2005 General Plan sets goals and policies to minimize risks to human lives and property from hazards and hazardous materials. Relevant policies direct the City to protect neighboring residential development from exposure to hazardous industrial materials and to enforce ordinances and regulations for the use, storage, and disposal of hazardous materials. Other policies are intended to enforce fire prevention standards and minimize fire hazards. Applicable goals, policies and implementation measures from the General Plan include:

Public Facilities and Services Element

- **Implementation Measure 11.G.2, Hazardous Wastes:** The City shall regulate the disposal of hazardous wastes at the current landfill site, and comply with state, federal, and local regulations for the disposal of commercial and household hazardous wastes.
- **Implementation Measure 11.J.1, Project Review:** The City shall continue to use Police and Fire Department project review to ensure that new development projects allow for built-in fire and police alarms and other public safety features, and to allow for review of potential traffic impacts on response time.

Public Safety Element

- **Goal 12.1 Land Use Safety:** Plan for and regulate the uses of land in order to provide a pattern of urban development which will minimize exposure to hazards from either natural or human-related causes.
- **Goal 12.4 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 that coordination is maintained between urban and rural fire districts for the prevention and suppression of structural and wildland fires.
- **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.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

The DWSP is a planning document to guide development; it does not propose specific development projects. Therefore, the following discussions provide program-level review of the potential aesthetic impacts that could result from implementation of the DWSP.

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant environmental effects related to hazards and hazardous materials if it would:

- 1.) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 2.) 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;
- 3.) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school;
- 4.) Be located on a site which is included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create significant hazard to the public or the environment;
- 5.) 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, result in a safety hazard or excessive noise for people residing or working in the project area;
- 6.) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- 7.) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As described in the Initial Study (Appendix A), implementation of the DWSP would have less than significant impacts related to the routine transport, use, or disposal of hazardous materials. Similarly, as discussed in the Initial Study, impacts related to emissions of hazardous materials near schools would be less than significant. Therefore, impacts of the DWSP related to significance Thresholds 1 and 3 would be less than significant, and these thresholds are not discussed further in this section. Significant threshold 6, pertaining to impairment of interference of an adopted emergency response plan or emergency evacuation plan, was also determined to be a less than significant impact in the Initial Study. Therefore, Threshold 6 is not discussed further in this section. As describe in the Initial Study, portions of the plan area are within two miles of the Watsonville Municipal Airport, but the plan area is not included within an airport safety zone or airport noise contours. Therefore, the DWSP would have no impacts related to significance threshold 5, and Threshold 5 is not discussed further in this section. Threshold 7 is not discussed further in this section, because as described in the Initial Study, the proposed project is downtown and would have no wildfire hazard impact.

Thresholds 2 and 4 are discussed below.

b. Project Impacts and Mitigation Measures

Threshold 2:	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?
Threshold 4:	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?

Impact HAZ-1 IMPLEMENTATION OF THE DWSP COULD ACCOMMODATE DEVELOPMENT ON OR NEAR HAZARDOUS MATERIALS SITES PURSUANT TO GOVERNMENT CODE SECTION 65962.5. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS AND IMPLEMENTATION OF MITIGATION MEASURES WOULD REDUCE IMPACTS TO LESS THAN SIGNIFICANT.

As described above in Section 4.5.1, *Setting*, the plan area contains multiple sites included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. The DWSP would not directly result in project development, because it is a policy and planning document. However, some construction envisioned in the DWSP, especially excavation for new building foundations and buried utility connections, could disturb contaminated soils and groundwater, potentially exposing construction works to hazardous materials. Additionally, construction activities could cause soils to become airborne dust, which could blow off-site and expose people in the vicinity. Impacts would be potentially significant and require implementation of mitigation.

The DWSP envisions new development and redevelopment throughout the plan area. Demolition of existing uses on identified sites that could be necessary to facilitate future development could require site assessment and remediation. If buildings and structures were constructed prior to the 1970s, lead and asbestos could be present and released into the environment during demolition activities. The California Department of Public Health and Cal/OSHA regulate lead and asbestos abatement necessary for construction and redevelopment projects. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal/OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over eight hours exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with requirements related to exposure, personal protective equipment, communication of hazards, and medical examination of workers.

The control of asbestos during demolition or renovation of buildings is also regulated under the federal Clean Air Act. The federal Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers, and disposing of the asbestos-containing waste material as expeditiously as practicable (USEPA 2022). Compliance with the mandatory requirements of CCR and the federal Clean Air Act would reduce the potential hazards and risks associated with release of asbestos.

Demolition of existing structures require to facilitate construction of the development envisioned in the DWSP could also create and release dust of lead-based paint. Similar to asbestos containing materials, construction workers or other people in proximity to demolition activities could be

exposed to lead from dust. Dust could also become mobilized in stormwater runoff during construction and discharge to surface waters, resulting in lead contamination. While there are existing regulations pertaining to the proper and safe remediation of lead-based paint, it is possible that construction could occur without prior knowledge of the potential presence of lead-based paint at the project site within the plan area. This would also be a potential risk for asbestos-containing materials. Impacts would be potentially significant and require mitigation to be implemented.

Future development under the DWSP would be required to comply with State and local laws regarding ACMs and/or lead-based paint (LBP) sampling prior to the demolition of onsite building(s) and provide documentation to the City prior to the commencement of demolition activities. Future development would be required to comply with the National Emission Standards for Air Pollution guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities would be in accordance with Cal/OSHA standards contained in Title 8, CCR, Section 1529, to protect workers from asbestos exposure. These conditions include, but are not limited to:

- Prior to commencement of demolition activities, a building survey, including sampling and testing, would be completed to identify and quantify building materials containing lead-based paint.
- During demolition activities, all building materials containing lead-based paint would be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, Section 1532.1, including employee training, employee air monitoring and dust control.
- Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.

Furthermore, a registered asbestos abatement contractor would be retained to remove and dispose of ACMs identified in the asbestos survey performed for the site in accordance with the standards stated above in this mitigation measure.

It is also possible that underground storage tanks (USTs) in use prior to permitting and record keeping requirements may be present in the plan area. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed; if such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank could be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and 6.75 (Underground Storage Tank Program) of the California Health and Safety Code as enforced and monitored by the County of Santa Cruz Environmental Health Division.

The extent to which groundwater may be affected by an underground tank, if at all, depends on the type of contaminant, the amount released, the duration of the release, and depth to groundwater. If groundwater contamination is present during construction, and construction reaches groundwater, there would be potential for construction workers to be exposed to contaminants. Additionally, if dewatering excavations is required, improper discharge of the groundwater could release contamination into surface waters. This would be a potentially significant impact, and implementation of mitigation would be required.

Mitigation Measures

HAZ-1(a) Property Assessment – Phase I and II ESAs

Prior to the start of construction (demolition or grading) on a known hazardous site within the plan area, project applicants shall retain a qualified environmental professional (EP), as defined by ASTM E-1527, to complete one of the following.

If the project is not listed in DTSC (GeoTracker) or SWRCB (EnviroStor) resources or other database comprising Government Code Section 65962.5, and requires more than five feet of excavation, then the proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase I ESA. If the Phase I ESA identifies recognized environmental conditions or potential concern areas, a Phase II ESA shall be prepared.

If the project site is currently listed, previously listed, or un-listed with a regulatory closure or no further action letter in DTSC (GeoTracker) or SWRCB (EnviroStor) resources or other database comprising Government Code Section 65962.5, then the project proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase II ESA to project proponent shall test to confirm that there are no existing hazardous materials posing a risk to human health. The Phase II ESA shall determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for commercial/industrial land uses. All recommended actions included in the Phase II ESA shall be followed. This may include the preparation of a Soil Management Plan (SMP) for Impacted Soils (see below) prior to project construction and/or completion of remediation at the proposed project prior to onsite construction.

The completed ESAs shall be submitted to the lead agency for review and approval prior to issuance of building or grading permits.

Soil Management Plan Requirements: The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan shall be submitted to the lead agency and must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials
- Monitoring and reporting
- A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
- The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The lead agency shall review and approve the development site Soil Management Plan for Impacted Soils prior to demolition and grading (construction).

Soil Remediation Requirements: If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project proponent shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.

The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

Remediation of impacted soils and/or implementation of remedial engineering controls, may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

The City shall review and approve the development site disposal recommendations prior to transportation of waste soils offsite and review and approve remedial engineering controls, prior to construction.

HAZ-1(b) Phase I/II Environmental Site Assessment

If groundwater is encountered during construction on properties included on a list compiled pursuant to Government Code Section 65962.5 or through a Phase I or Phase II ESA pursuant to Mitigation Measure HAZ-1, an Environmental Professional shall be called to the site to determine safe handling procedures. The groundwater shall be pumped into appropriate containers and samples shall be obtained for chemical analysis of the Contaminants of Potential Concern in accordance with the requirements of the waste disposal facility to which the material would be sent. If water sample analytical results indicate the water is free of all detectable concentrations of Contaminants of Potential Concern, such water can be re-used at the site if deemed appropriate by the RWQCB. If water sample analytical results indicate the water contains concentrations of Contaminants of Potential Concern above appropriate RWQCB screening levels, such water shall not be re-used at the site. The contractor and the Environmental Professional shall elect to: (a) treat the groundwater onsite to render it free of detectable concentrations of Contaminants of Potential Concern (e.g., by activated carbon filtration); or, (b) transport the groundwater to a local treatment or disposal facility for appropriate handling.

Significance After Mitigation

Mitigation Measure HAZ-1(a) requires that any development that requires more than five feet of excavation would require a Phase I ESA, and a Phase II ESA if environmental concerns are discovered through the Phase I ESA. Additionally, this measure ensures that any potential development site location listed on DTSC, SWRCB or other database comprising Government Code Section 65962.5 conducts a Phase II ESA for soil sampling and environmental professional recommendations for remediation, as needed. Mitigation Measures HAZ-1(b) would reduce impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Implementation of Mitigation Measures HAZ-1(a) and HAZ-1(b) would reduce potential impacts to a less than significant level.

c. Cumulative Impacts

Impacts associated with hazards and hazardous materials are generally site-specific. However, because hazardous sites could extend from a property or roadway in the plan area onto adjoining areas, the cumulative impact analysis area for hazards and hazardous materials consists of the plan area and properties adjoining the plan area boundary.

Development of past, present, and reasonably foreseeable future projects in the vicinity of the site could cumulatively increase the potential for exposure of people to contamination from asbestos, lead-based paint, and other hazardous materials. This exposure could occur as a result of ground disturbance during construction or from demolition of buildings, or from accidental release or spills. However, there are existing federal, state, and local regulations and oversight in place that would effectively reduce the inherent hazard associated with the release of hazardous materials. Regulations and oversight, as outlined above in Section 4.5.2, *Regulatory Setting*, would also effectively reduce the potential for cumulative projects to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions. Therefore, reasonably foreseeable future development would not result in cumulatively considerable impacts associated with the routine use and handling of hazardous materials, as well as from upset and accident conditions.

The reasonably foreseeable future projects listed in Table 3-1 are not on property or parcels listed in environmental databases pursuant to Government Code Section 65962.5. Accordingly, the development of the reasonably foreseeable future projects would not create a substantial hazard to the public or the environment associated with Government Code Section 65962.5 hazardous sites. The DWSP would not result in cumulatively considerable impacts to hazardous materials or sites. Furthermore, development of listed sites would be required to undergo remediation and comply with Mitigation Measures HAZ-1(a) and HAZ-1(b), above. With implementation of mitigation and mandatory compliance with regulations, the DWSP would not result in a cumulatively considerable contribution associated with development on sites included on a list compiled pursuant to Government Code Section 65962.5.

4.6 Noise

This section describes the existing or ambient noise sources and levels in the area and regulations and policies pertaining to noise. This section also evaluates the potential impacts of the DWSP to local noise conditions.

4.6.1 Setting

Fundamentals of Sound, Environmental Noise, and Sound Measurement

Noise is defined as unwanted sound that disturbs human activity. Noise levels (or volumes) are generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz) (Caltrans 2013).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the ambient noise level to be judged as twice as loud. In general, a 3 dBA change in the ambient noise level is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while areas adjacent to arterial streets are typically in the 50-60 dBA range. Normal conversational levels are usually in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations (Caltrans, 2013).

According to Caltrans, a change of 5 dBA in noise levels is readily perceptible (8 times the sound energy); and an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5 times the sound energy) (Caltrans, 2013).

Noise levels typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance from point sources of noise, such as industrial machinery. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures and other obstructions; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA (Federal Transit Administration [FTA], 2006). The manner in which homes in California are constructed generally provides a reduction of exterior-to-interior noise levels of about 25 dBA with closed windows (FTA, 2006).

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. L_{eq} is essentially the average noise level. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root mean squared sound pressure level within the measuring period, and L_{min} is the lowest root mean squared sound pressure level within the measuring period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 PM to 7 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 PM to 10 PM and a 10 dBA penalty for noise occurring from 10 PM to 7 AM. Noise levels described by L_{dn} and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and L_{dn} are often used interchangeably.

The relationship between peak hourly L_{eq} values and associated L_{dn} values depends on the distribution of traffic over the entire day. There is no precise way to convert a peak hourly L_{eq} to L_{dn} . However, in urban areas near heavy traffic, the peak hourly L_{eq} is typically 2-4 dBA lower than the daily L_{dn} or CNEL. In less heavily developed areas, such as suburban areas, the peak hourly L_{eq} is often roughly equal to the daily L_{dn} or CNEL. For rural areas with little nighttime traffic, the peak hourly L_{eq} will often be 3-4 dBA greater than the daily L_{dn} or CNEL value (Caltrans 2013).

Fundamentals of Groundborne Vibration

Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. 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 at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans, 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation. The FTA has determined vibration levels with potential to damage nearby buildings and structures; these levels are identified in Table 4.6-1.

Table 4.6-1 Criteria for Vibration Damage Potential

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

in/sec = inches per second; PPV = peak particle velocity
Source: FTA 2018

Sensitive Receptors

Typically, noise sensitive land uses include single family residential, multiple family residential, churches, hospitals and similar health care institutions, convalescent homes, libraries, and school classroom areas. The predominant noise sensitive land uses in the DWSP plan area are residential uses.

Several noise-sensitive receptors are located adjacent to and within the plan area. Noise-sensitive receptors not within but closest to the plan area include single and multi-family residential uses adjacent to the northern boundary of the plan area, single family residential uses adjacent to the eastern boundary of the plan area, Watsonville High School located approximately 610 feet from the eastern boundary of the plan area, multi-family residential uses adjacent to the southern boundary of the plan area, and single and multi-family residential uses adjacent to the northwestern boundary of the project site.

Existing Noise Conditions and Sources

The plan area encompasses approximately 195.5 acres within Downtown Watsonville, located in the southeastern portion of the City. Downtown is centered on Main Street and extends west to the edge of existing neighborhoods and the industrial district, south to Pajaro, and several blocks east to the existing neighborhoods. State Route (SR) 152 runs through the center of the plan area and operates along portions of Main Street and as a one-way couplet along East Lake Avenue and East Beach Street. Riverside Drive on the south end of the plan area is a part of SR 129. The predominant noise sources contributing to ambient noise levels are transportation-related noise sources including vehicle traffic along highways, roadways and railroad.

Vehicle traffic along Main Street and Riverside Drive are primary contributors to ambient noise levels in the plan area. Major arterial roadways include Main Street, Riverside Drive, East Beach Street, and Walker Street. Table 4.6-2 summarizes ambient noise at various distances from the centerline of Main Street, East Beach Street, East Riverside Drive, and Walker Street (City of Watsonville, 2020). The ambient noise levels from these roadways were estimated using the U.S. Department of Housing and Urban Development's Day/Night Noise Level Calculator (HUD DNL Calculator) and are expressed as 24-hour average weighted noise levels (DNL). As shown in Table 4.6-2, noise levels that are conditionally acceptable for residential uses (70 CNEL) are achieved at approximately 64 feet from the centerlines of Main Street, approximately 40 feet from the centerline of East Beach Street, approximately 80 feet from the centerline of East Riverside Drive, and approximately 142 feet from the centerline of Walker Street (City of Watsonville, 2020).

Table 4.6-2 Roadway Ambient Noise Level Conditions

DNL (dB)	Distance from Roadway Centerline			
	Main Street	East Beach Street	East Riverside Drive	Walker Street
60	315 feet	197 feet	385 feet	692 feet
65	140 feet	88 feet	170 feet	345 feet
70	64 feet	40 feet	80 feet	142 feet
75	30 feet	19 feet	39 feet	66 feet
80*	14 feet	N/A	18 feet	31 feet

Source: Downtown Watsonville Specific Plan Existing Conditions Report

* 80 DNL is within existing travel lanes of Main Street and East Riverside Street. Traffic noise does not reach 80 DNL on East Beach Street.

Existing railroad tracks coincide with a segment of the southwestern boundary of the plan area, adjacent to Walker Street. Rail operations in Watsonville are limited, and therefore have little impact on the daily level of noise in the plan area. Although sound levels generated by train travel have been measured at 86 dBA at 50 feet, and whistle blasts may be as high at 98 dBA, these sound levels are of very short duration and occur infrequently (City of Watsonville, 2012). Existing daily frequency of freight operations does not regularly generate sound levels that exceed desirable standards (i.e., 60 dBA) (City of Watsonville, 2012).

4.6.2 Regulatory Setting

a. Federal Regulations

There are no federal noise requirements or regulations that apply directly to the DWSP. However, there are federal regulations that influence the audible landscape, especially for projects where federal funding is involved. For example, the Federal Highway Administration requires abatement of highway traffic noise for highway projects through rules in the Code of Federal Regulations (23 CFR Part 772). Each agency recommends thorough noise and vibration assessments through comprehensive guidelines for highway, mass transit, or high-speed railroad projects that would pass by residential areas.

b. State Regulations

California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. California law requires each county and city to adopt a General Plan that includes a Noise Element prepared based on guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. CEQA requires known environmental effects of a project be analyzed, including environmental noise impacts.

California Building Code

California Code of Regulations (CCR) Title 24, Building Standards Administrative Code, Part 2 and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to an acceptable level of 45 dBA CNEL.

California Green Building Code

California Green Building Standards Code 2019 (CalGreen) Section 5.507.4, Acoustical Control, regulates construction within the 65 dBA L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1.1 "buildings exposed to a noise level of 65 dB $L_{eq}(1-hr)$ during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method (CalGreen Section 5.507.4.1) or performance method (CalGreen Section 5.507.4.2).

- Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source shall meet a composite Sound Transmission Class rating of at least 50 or a composite Outdoor-Indoor Transmission Class rating of no less than 40, with exterior windows of a minimum Sound Transmission Class of 40 or Outdoor-Indoor Transmission Class of 30.
- Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source shall be constructed to provide an interior noise environment that does not exceed 50 dB L_{eq} -1-hour in occupied areas during hours of operations.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the responsibility to set specific noise standards based on local conditions. See the discussion below, under Section c., *Local Regulations*, for the compatibility guidelines adopted by the City of Watsonville.

c. Local Regulations

City of Watsonville 2005 General Plan

The *Watsonville 2005 General Plan* (City of Watsonville 2005) provides standards for exterior and interior ambient noise levels. The General Plan's Public Safety Element provides comprehensive noise goals and objectives, as well as policies and standards for acceptable noise levels. The maximum exterior sound level acceptable in residential and noise-sensitive land uses is 60 dBA and the maximum allowable interior noise level is 45 dBA as stated in the 2005 General Plan. The noise section establishes land use compatibility guidelines for community noise environments, as shown in Table 4.6-3. The guidelines rank noise levels for various land use types as normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable based on CNEL levels.

Table 4.6-3 Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Single Family, Duplex, Mobile Homes	50-60	55-70	70-75	75-85
Residential – Multi-family	50-65	60-70	70-75	70-85
Transient Lodging – Motel, Hotel	50-65	60-70	70-80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-70	60-70	70-80	80-85
Auditoriums, Concert Halls, Amphitheaters	N/A	50-70	N/A	65-85
Sports Arenas, Outdoor Spectator Sports	N/A	50-75	N/A	70-85
Playgrounds, Neighborhood Parks	50-70	N/A	67.5-75	72.5-85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	N/A	70-80	80-85
Office Buildings, Business Commercial, and Professional	50-70	67.5-77.5	75-85	N/A
Industrial, Manufacturing, Utilities, Agriculture	50-75	70-80	75-85	N/A

Notes: *Normally Acceptable*: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of Watsonville 2005.

City of Watsonville Municipal Code

To implement the City’s noise policies, the City adopted Title 5 Chapter 8 “Noise” of the Watsonville Municipal Code (WMC). WMC Chapter 5-8 prohibits specific types of noises, such as continuous or unusually loud noise which disturbs residential property or public ways within the City. WMC Section 5-8.02 prohibits noise that is louder than necessary and disturbs the quiet of residential properties and public ways between the hours of 10:00 PM and 7:00 AM in such a manner as to be plainly audible at a distance of 50 feet from the sensitive receptor.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Significance Thresholds

The analysis of noise impacts considers the effects of both temporary construction-related noise and long-term noise associated with operation of the development envisioned in the DWSP. Impacts

would be significant if they would exceed the following thresholds of significance, based on Appendix G of the State *CEQA Guidelines*:

- 1) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- 2) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- 3) 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 Initial Study (Appendix A) found that the DWSP would have no impacts related to excessive noise within airports or airport zones. Therefore, Threshold 3 is not analyzed further in this section.

Construction Noise

This section estimates construction noise from development envisioned in the DWSP based on reference noise levels for various pieces of construction equipment reported by the FTA's *Noise and Vibration Impact Assessment*. Construction equipment may operate as close as 10 feet from nearby noise-sensitive receptors; however, over the course of a normal construction day, the equipment would typically move back and forth across a construction site and average a further distance from noise-sensitive receptors. For analysis purposes, a distance of 25 feet was used to demonstrate typical construction noise levels. Construction noise estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations. This is especially relevant in the plan area which is largely developed with buildings.

As the City does not define a quantitative construction noise threshold, for purposes of analyzing impacts from development facilitated by the project, the FTA construction criteria are applicable to construction noise generated by development facilitated under the project. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA, 2018). For residential uses, the daytime noise threshold for an 8-hour period is 80 dBA L_{eq} . Construction noise would have a significant impact if it exceeds this threshold.

Operational Stationary Source Noise

The City of Watsonville has adopted exterior and interior noise standards for residential land uses that state that residential and noise-sensitive land uses cannot be exposed to outdoor ambient noise levels exceeding 60 dBA. Interior ambient noise levels for residential land uses cannot exceed 45 dBA CNEL. The project would have a significant impact if it would expose existing sensitive receptors to noise levels in excess of these standards.

Operational Traffic Noise

For traffic-related noise, impacts would be significant if the project would result in exposure of sensitive receptors to an unacceptable increase in noise levels. As described under Section 4.6.1, *Setting*, above, a doubling of sound power (increase of 3 dBA) is considered 'barely perceptible' to the human ear, while an increase of 5 dBA is considered 'readily perceptible.' For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise

environment of noise-sensitive locations by the stricter limit of 3 dBA CNEL or more (barely perceptible), since the existing noise levels surrounding the plan area occur near sensitive receptors (residential areas).

Groundborne Vibration

The City has not adopted a significance threshold to assess vibration impacts during construction and operation. Therefore, the Transit Noise and Vibration Impact Assessment Manual (FTA 2018) was used to evaluate potential construction vibration impacts related to potential building damage. Construction vibration impacts from development facilitated by the project would be significant if vibration levels exceed the FTA criteria shown in Table 4.6-1. For example, impacts would normally be significant if vibration levels exceed 0.2 in./sec. PPV for residential structures and 0.3 in./sec. PPV for commercial structures. This is the limit where minor cosmetic (i.e., non-structural) damage may occur to these buildings. However, groundborne vibration would also have the potential to impact structures near a site with historic significance at much lower levels. Therefore, for a conservative analysis to these buildings, construction vibration impacts would be significant if vibration levels exceed 0.12 in./sec. PPV for extremely fragile historic buildings, as shown in Table 4.6-1.

Methodology

Construction Noise

Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders (FTA 2018). Each phase of typical construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels than others and some may have high-impact intermittent noise levels (FTA 2018). Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects on vacant sites, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area. For assessment purposes, potential construction noise impacts from construction activities were modeled at a reference distance of 25 feet to analyze potential construction noise levels due to setback distances between equipment and nearby sensitive receptors.

Heavy construction equipment during grading and site preparation for development facilitated by the project would typically include bulldozers, excavators, front-end loaders, dump trucks, and graders. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment. In addition, construction equipment would not be in constant use during the 8-hour operating day.

Impact devices such as pile drivers may be used for construction facilitated by the DWSP. A pile driver is used to drive foundation piles into the ground. Although use of pile drivers is uncommon during construction for the types of development facilitated by the project, this analysis considers the potential for use of this equipment as a conservative analysis as some terrain features or building height may require their use. These devices would typically operate separately from other equipment.

Stationary Operational Noise

Stationary noise (i.e., onsite operational noise) was analyzed in context of typical mechanical equipment on commercial, industrial, residential and mixed-use development such as heating, ventilation, and air conditioning (HVAC) units, landscaping and maintenance activities, and loading docks.

Operational Traffic Noise Increases

The project's vehicle trip noise impacts are analyzed based on transportation data provided in a Transportation Impact Analysis prepared for the DWSP by Kimley Horn in March 2023. The report is included as Appendix E. The overall increase in traffic noise was estimated using roadway segment traffic volume for existing conditions and future conditions with development envisioned in the DWSP.

Groundborne Vibration

Development envisioned by the DWSP would not include substantial sources of vibration associated with operation because the DWSP largely envisions commercial and residential development. These uses typically do not generate substantial vibration because they do not involve use of heavy machinery. Therefore, construction activities have the greatest potential to generate groundborne vibration affecting nearby receptors, especially during grading, excavation, and paving.

Because groundborne vibration could cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be the edge of a project site, to the edge of the nearest off-site structures. For assessment purposes, potential vibration impacts from construction activities were modeled at a reference distance of 25 feet to analyze potential vibration levels due to setback distances between equipment and off-site structures.

b. Project Impacts and Mitigation Measures

Threshold 1: 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?

Impact NOI-1 CONSTRUCTION OF DEVELOPMENT ENVISIONED BY THE DWSP WOULD TEMPORARILY INCREASE NOISE LEVELS AT NEARBY NOISE-SENSITIVE RECEPTORS. OPERATION OF DEVELOPMENT ENVISIONED BY THE DWSP WOULD INTRODUCE NEW ONSITE NOISE SOURCES AND CONTRIBUTE TO INCREASES IN TRAFFIC NOISE. CONSTRUCTION AND ONSITE OPERATIONAL NOISE COULD EXCEED STANDARDS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION.

Construction

Construction noise from individual development projects envisioned by the DWSP would temporarily increase noise levels at nearby noise-sensitive receptors. At this stage of planning, project-level details are not available for future individual projects that could be carried out as development envisioned by the DWSP, it is not possible to determine exact noise levels, locations, or time periods for construction of such individual projects, or construction noise at adjacent

properties. However, based on typical construction activities, development would generate noise from activities such as demolition, site preparation, grading, building construction, and paving. Each phase or type of construction has a specific equipment mix and associated noise characteristics, depending on the equipment used during that phase or project. Construction noise would typically be higher during the more equipment-intensive phases of initial construction (i.e., demolition, site preparation, and grading work) and would be lower during the later construction phases (i.e., building construction and paving). Table 4.6-4 illustrates typical noise levels associated with construction equipment at distances of 25 feet, 50 feet, and 100 feet. Noise levels are shown to a maximum of 100 feet because the plan area is urbanized and developed, and existing sensitive noise receptors would generally occur within 100 feet or less of development within the plan area.

Table 4.6-4 Typical Noise Levels for Construction Equipment

Equipment	Estimated Noise Levels at Standard Distances from Noise Source (dBA L _{eq})		
	25 feet	50 feet	100 feet
Air Compressor	86	80	74
Backhoe	86	80	74
Concrete Mixer	91	85	79
Dozer	91	85	79
Grader	91	85	79
Jack Hammer	94	88	82
Loader	86	80	74
Paver	91	85	79
Pile-drive (Impact)	107	101	95
Pile-driver (Sonic)	101	95	89
Roller	91	85	79
Saw	82	76	70
Scarified	89	83	77
Scraper	91	85	79
Truck	90	84	78

Source: FTA 2018.

As shown in Table 4.6-4, construction noise may exceed the FTA's daytime noise limits of 80 dBA L_{eq}, depending on the equipment used and the distance in which the equipment is operating compared to noise-sensitive receptors. Therefore, construction noise levels associated with future projects may exceed the daytime FTA construction noise threshold of 80 dBA L_{eq} for an 8-hour period at residential uses and other noise sensitive receptors, and impacts would be potentially significant, and implementation of Mitigation Measure NOI-1(a) would be required.

Operation

STATIONARY (ONSITE OPERATIONAL) NOISE

Stationary onsite sources of noises may occur on all types of land uses. Residential uses would generate noise from landscaping, maintenance activities, and mechanical equipment such as ground-level and rooftop HVAC systems. Commercial uses would generate stationary noise from HVAC systems, loading docks, and other sources. Industrial uses may generate noise from HVAC systems, loading docks, and possibly machinery. Noise generated by residential or commercial uses is generally short and intermittent. Industrial uses may generate noise on a more continual basis. Nightclubs, outdoor dining areas, gas stations, car washes, fire stations, drive-throughs, swimming pool pumps, school playgrounds, athletic and music events, and public parks are other common noise sources. These land uses types and their associate noise types are already typical of the plan area.

Compliance with 2005 General Plan implementation measures 12.M.4 and 12.M.6 would reduce potential impacts associated with new noise-producing land uses. Implementation measure 12.M.4 calls for the City to use the development review process and provisions of the Uniform Building Code to ensure adequate levels of sound proofing in all new construction. Implementation measure 12.M.6 calls for the City to evaluate sire orientation and building design to decrease the potential for noise intrusion, using the noise contour map and compatibility guidelines. However, since at this stage of planning, project-level details are not available for future individual development projects that would be facilitated by the project, it is not possible to determine onsite operational noise levels and the locations of onsite operational noise generating sources. Onsite operational noise could exceed the City's maximum exterior sound level of 60 dBA for residential and noise sensitive land uses. Therefore, onsite operational impacts from development facilitated by the project would be potentially significant, and implementation of Mitigation Measure NOI-2 would be required.

TRAFFIC NOISE

The DWSP would encourage higher-intensity, mixed-use neighborhoods than currently permitted, leading to additional vehicle trips on area roadways. As described in Section 2, *Project Description*, the project envisions the addition of approximately 231,151 square feet of commercial space, 376,827 square feet of industrial space, and 114,572 square feet of civic space. In addition, the project envisions the addition of up to 3,886 new residential units. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise.

Table 4.6-5 summarizes the estimated traffic noise when the DWSP vehicle trips are added to existing traffic on key roadway segments in the plan area based on average daily traffic (ADT) volumes provided by Kimley Horn (Kimley Horn, 2023). As shown in Table 4.6-5, the maximum increase in traffic noise would be 2.34 dBA CNEL under cumulative plus project conditions along Lake Avenue west of Brennan Street. This would not exceed the significance threshold of 3 dBA CNEL identified in *Significance Thresholds*, discussed above. Therefore, impacts related to increases in traffic noise would be less than significant.

Table 4.6-5 Traffic Noise Increase

Roadway Segment	Existing ADT (2022)	Existing + Project ADT	Traffic Noise Increase (dBA CNEL/Ldn)
Main Street - West of Rodriguez Street	26,929	30,800	0.58
Main Street - East of Rodriguez Street	21,153	22,730	0.31
Main Street - South of Freedom Boulevard	22,165	22,706	0.10
Main Street - North of Lake Avenue	20,165	23,153	0.60
Main Street - South of Lake Avenue	19,200	23,259	0.83
Main Street - South of Beach Street	18,235	24,306	1.25
Main Street - North of Riverside Drive	18,565	21,036	0.54
Main Street - South of Riverside Drive	35,706	37,212	0.18
Rodriguez Street - South of Main Street	6,624	8,495	1.08
Freedom Boulevard - East of Main Street	16,247	16,130	-0.03
Freedom Boulevard - East of Brennan Street	17,212	18,130	0.23
Brennan Street - South of Freedom Boulevard	7,788	9,059	0.66
Brennan Street - North of Lake Avenue	8,094	7,248	-0.48
Union Street - South of Lake Avenue	8,612	7,765	-0.45
Lake Avenue - East of Brennan Street	10,494	14,577	1.43
Lake Avenue - West of Brennan Street	8,729	14,977	2.34
Lake Avenue - West of Main Street	5,412	6,306	0.66
Beach Street - East of Alexander Street	8,400	10,542	0.99
Beach Street - West of Alexander Street	8,929	11,577	1.13
Beach Street - East of Main Street	9,565	11,224	0.69
Beach Street - West of Main Street	7,482	11,024	1.68
Riverside Drive - East of Main Street	20,376	21,236	0.18
Riverside Drive - West of Main Street	22,482	24,095	0.30

ADT: Average Daily Traffic.

Source: Kimley Horn 2023.

Mitigation Measures

NOI-1(a) Conduct Construction Noise Analysis

The City shall require future projects that are subject to discretionary approval and that are not found to be exempt from CEQA review to evaluate potential construction noise impacts on nearby sensitive uses as part of project-level CEQA analysis and implement respective mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce construction noise include, but are not limited to:

- **Mufflers.** During excavation and grading construction phases, construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- **Stationary Equipment.** Stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors.

- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.
- **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
- **Signage.** For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for individuals who desire to file a noise complaint.
- **Temporary Noise Barriers.** Where necessary to meet the FTA criterion of 80 dBA $L_{eq}(8 \text{ Hr})$ for daytime construction affecting residential uses, erect temporary noise barriers at a height of 12 feet minimum to block the line-of-sight between construction equipment and receptors. Barriers shall be constructed with a solid material that has a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier.
- **Noise Disturbance Coordinator.** The project applicant shall designate a “noise disturbance coordinator” responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site

The City shall confirm that these measures are implemented during construction by monitoring the project at least once per month.

NOI-1(b) Conduct Stationary Operational Noise Analysis

The City shall require future development projects that are subject to discretionary approval to evaluate potential onsite operational noise impacts as part of project-level CEQA analysis on nearby noise-sensitive uses and to implement any required mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce onsite noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers. The effectiveness of noise reducing measures shall be monitored to confirm effectiveness.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1(a) would reduce construction noise impacts from development facilitated by the project. Implementation of Mitigation Measure NOI-1(b) would reduce potential onsite noise impacts associated with development facilitated by the project by conducting stationary operational noise analyses for future projects. However, as exact details of future project-specific construction activities and stationary sources are unknown at this stage of planning, City noise standards could be exceeded. Therefore, construction and operational noise impacts from development facilitated by the DWSP would be significant and unavoidable.

Threshold 2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF DEVELOPMENT ENVISIONED BY THE DWSP WOULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION. IF REQUIRED FOR CONSTRUCTION, PILE DRIVING OR USE OF A VIBRATORY ROLLER COULD POTENTIALLY EXCEED FTA VIBRATION THRESHOLDS AND IMPACT PEOPLE OR BUILDINGS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION.

Construction Vibration

Construction of development envisioned by the DWSP would intermittently generate groundborne vibration, which could be felt or experienced at nearby sensitive receptors. Table 4.6-6 lists groundborne vibration levels from various types of construction equipment at various distances. Due to typical setbacks from equipment size and off-site structures, it is assumed that 25 feet is the closest distance that the center of construction vibration is generated to sensitive receptors. Although groundborne vibration is sometimes noticeable in outdoor environments, groundborne vibration is almost never annoying to people who are outdoors; the vibration level threshold for human perception is assessed at occupied structures (FTA 2018). Therefore, vibration impacts are assessed at the structure of an affected property.

Table 4.6-6 Vibration Source Levels for Construction Equipment

Equipment		Approximate Vibration Level (in/sec PPV)			
		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.042	0.019	0.009
Jackhammer		0.035	0.016	0.008	0.004
Large Bulldozer		0.089	0.042	0.019	0.009
Loaded Truck		0.076	0.036	0.017	0.008
Pile Driver (impact)	Upper range	1.519	0.709	0.331	0.154
	Typical	0.644	0.300	0.140	0.065
Pile Driver (sonic)	Upper range	0.734	0.342	0.160	0.075
	Typical	0.170	0.079	0.037	0.017
Small Bulldozer		0.003	0.001	0.0007	0.0003
Vibratory Roller		0.21	0.098	0.046	0.021

Source: FTA 2018

As shown in Table 4.6-6, sensitive receptors and buildings could experience the strongest vibration during the use of pile-drivers and vibratory rollers. Vibration levels from pile-drivers could approach 1.519 in/sec PPV at 25 feet from the source and 0.331 in/sec at 100 feet, and vibration levels from vibratory rollers could approach 0.21 in/sec PPV at 25 feet and 0.046 at 100 feet. As discussed under *Significance Thresholds* above, the most conservative level for structures is 0.12 in/sec for historical structures, and the level is higher for residential units at 0.2 in/sec, and at 0.3 in/sec for commercial uses.

Based on the attenuation distances of vibration from standard construction equipment, projects that require pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential

buildings), or within 75 feet of engineered concrete and masonry (no plaster); a vibratory roller within 25 feet of any structure; or a dozer or other heavy earthmoving equipment within 15 feet of any structure could result in potential damages to existing structures.

Vibration levels from vibratory rollers and pile driving equipment may exceed the FTA standards of limiting vibration levels to below 0.12 in/sec for historic structures to prevent architectural damage. The 2005 General Plan and WMC do not include any policies addressing construction vibration or pile driving and mitigation measures to reduce the vibration impacts from construction. Additionally, since at this stage of planning, project-level details are not available for individual development that could be carried out as envisioned in the DWSP, it is not possible to determine which individual development projects may use vibratory rollers and/or pile driving and their exact vibration levels, locations, or time periods for construction of such projects. Therefore, construction vibration levels may exceed FTA's vibration levels for preventing damage, and impacts would be potentially significant. Implementation of Mitigation Measure NOI-2 would be required.

Operation

Residential, commercial, industrial, and retail land use development facilitated by the project would not involve substantial new vibration sources associated with operation. Much of the plan area is developed with the same uses envisioned in the DWSP. Therefore, vibration impacts generated by the operation of the project would be less than significant.

Mitigation Measures

NOI-2 Vibration Control Plan

Based on the attenuation distances of vibration from standard construction equipment, prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); a vibratory roller within 25 feet of any structure; or a dozer or other heavy earthmoving equipment within 15 feet of any structure, the project applicant shall prepare a vibration analysis to assess and mitigate potential vibration impacts related to these activities. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower dozers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

Where vibration monitoring is determined to be necessary, a pre-construction baseline survey shall be conducted at buildings and structures within the screening distances by a licensed structural engineer. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. A vibration monitoring and construction contingency plan shall be developed to identify where monitoring would be conducted, set up a vibration monitoring schedule, and define structure-specific vibration limits. Construction contingencies would be identified for when vibration levels approach the limits. If vibration levels approach limits, the contractor shall suspend construction and implement contingencies to either lower vibration levels or secure the affected structure.

Where historic structures are involved, the engineer shall provide a shoring design or other methods to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

A Statement of Compliance signed by the applicant and owner is required to be submitted to the City of Watsonville Building Division at plan check and prior to the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person's contact information shall be posted in a location near the project site that is clearly visible to the nearby receptors most likely to be disturbed. The Director would manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.

Significance After Mitigation

Mitigation Measure NOI-2 would reduce potential vibration impacts from a vibratory roller and/or pile driving activities in the plan area associated with development facilitated by the project. However, as exact details of future individual development project-specific construction activities are unknown at this stage of planning, vibration could still exceed FTA vibration limits for building damage. Therefore, project construction vibration impacts would be significant and unavoidable.

c. Cumulative Impacts

IMPACT NOI-C1: THE CONSTRUCTION ACTIVITIES FOR THE DEVELOPMENT ENVISIONED IN THE DWSP WOULD HAVE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TOWARD A SIGNIFICANT CUMULATIVE IMPACT ON NOISE.

The cumulative impact assessment area for noise in the area within the city limits of Watsonville. This is an appropriate geographical area for this cumulative impact assessment because the DWSP and other reasonably foreseeable future projects would occur entirely in the city limits. Noise from these projects would attenuate over distance, such as beyond the city limits. Likewise, noise originating from sources outside of the city limits would attenuate and not be substantial upon reaching the city limits.

The reasonably foreseeable future projects listed in Table 3-1 are a mix of land uses, such as commercial, office, and residential uses. Each of these uses would generate noise, such as HVAC equipment for buildings, noise from landscaping, or temporary noise during construction. Two or more reasonably foreseeable future projects located in proximity to each other and having overlapping construction schedules could contribute to noise levels exceeding City standards at nearby receptors. Construction noise generated by the development envisioned in the DWSP would, without mitigation, substantially increase noise levels in the vicinity of specific projects or developments in the plan area. Mitigation Measure NOI-1(a) would reduce noise from construction equipment from future projects or development envisioned in the DWSP. Therefore, unless construction of cumulative projects, including the development envisioned in the DWSP, occur in

proximity to each other and simultaneously, noise from individual construction projects have a small chance of combining to create significant cumulative impacts. Although this scenario is unlikely, and mitigation measures would be implemented to the extent feasible, the potential remains for a cumulatively considerable increase in construction noise from future development envisioned in the DWSP. Therefore, the construction noise resulting from development envisioned in the DWSP would have a cumulatively considerable contribution toward a significant cumulative impact.

Development facilitated by the project would introduce new stationary noise sources to the ambient noise environment in the vicinity of the plan area, including new mechanical ventilation equipment. These sources may combine with other nearby cumulative projects to result in higher noise levels. However, operational noise from these sources is localized and rapidly attenuates within an urbanized setting because of intervening structures and topography that block the line of sight and due to other noise sources closer to receptors that obscure project-related noise. Therefore, cumulative impacts related to operational noise would be less than significant. Implementation of the City's noise standards would ensure that noise from new stationary sources as part of the development envisioned in the DWSP would be within acceptable levels. Therefore, the DWSP would not result in cumulatively considerable cumulative impact related to operational stationary noise.

The vehicle trips generated from reasonably foreseeable future projects and the development envisioned in the DWSP would combine on roadways within the cumulative impacts assessment area. The addition of these trips would contribute to traffic or roadway noise. Table 4.6-7 summarizes the estimated cumulative plus project traffic noise increase based on ADT volumes provided by Kimley Horn (Kimley Horn 2023). As shown in Table 4.6-5, the maximum increase in traffic noise would be 2.64 dBA CNEL under cumulative plus project conditions along Lake Avenue west of Brennan Street. This would not exceed the significance threshold of 3 dBA CNEL identified in *Significance Thresholds*, discussed above. Therefore, cumulative impacts related to increases in traffic noise would be less than significant.

Table 4.6-7 Cumulative Traffic Noise Increase

Roadway Segment	Existing ADT (2022)	Cumulative + Project ADT	Traffic Noise Increase (dBA CNEL/Ldn)
Main Street - West of Rodriguez Street	26,929	32,847	0.86
Main Street - East of Rodriguez Street	21,153	24,071	0.56
Main Street - South of Freedom Boulevard	22,165	24,047	0.35
Main Street - North of Lake Avenue	20,165	24,494	0.84
Main Street - South of Lake Avenue	19,200	23,647	0.90
Main Street - South of Beach Street	18,235	25,941	1.53
Main Street - North of Riverside Drive	18,565	22,671	0.87
Main Street - South of Riverside Drive	35,706	41,000	0.60
Rodriguez Street - South of Main Street	6,624	9,976	1.78
Freedom Boulevard - East of Main Street	16,247	17,682	0.37
Freedom Boulevard - East of Brennan Street	17,212	18,506	0.31
Brennan Street - South of Freedom Boulevard	7,788	10,635	1.35
Brennan Street - North of Lake Avenue	8,094	7,447	-0.36
Union Street - South of Lake Avenue	8,612	8,412	-0.10
Lake Avenue - East of Brennan Street	10,494	16,071	1.85

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Roadway Segment	Existing ADT (2022)	Cumulative + Project ADT	Traffic Noise Increase (dBA CNEL/Ldn)
Lake Avenue - West of Brennan Street	8,729	16,024	2.64
Lake Avenue - West of Main Street	5,412	6,400	0.73
Beach Street - East of Alexander Street	8,400	11,424	1.34
Beach Street - West of Alexander Street	8,929	13,106	1.67
Beach Street - East of Main Street	9,565	12,541	1.18
Beach Street - West of Main Street	7,482	13,588	2.59
Riverside Drive - East of Main Street	20,376	22,000	0.33
Riverside Drive - West of Main Street	22,482	26,259	0.67

ADT: Average Daily Traffic.

Source: Kimley Horn 2023.

The potential for construction groundborne vibration and noise impacts is within relatively close distances (e.g., within approximately 25 feet for a vibratory roller), even though there could be other cumulative projects simultaneously under construction near a development project facilitated by the project. Since no two construction cumulative projects would both be within 25 feet of a given sensitive structure, cumulative groundborne vibration and noise impacts would be less than significant.

4.7 Population and Housing

This section evaluates the potential impacts of the proposed project in terms of population and housing.

4.7.1 Setting

Population

The City of Watsonville had an estimated population of 50,669 residents in 2022, representing approximately 19 percent of the Santa Cruz County population of 266,564 (California Department of Finance [DOF] 2022). While varying year to year, the City's population has been generally stable over the last ten years; Watsonville had an estimated population of 51,847 a decade ago in 2012, approximately 2 percent greater than the current 2022 population (DOF 2021).

The City's population change in 5-year increments from 2012 to 2022 is shown in Table 4.7-1. The City's population grew by approximately 1.7 percent between 2012 to 2017 but decreased by 4 percent from 2017 to 2022.

Table 4.7-1 City of Watsonville Population Growth

	2012	2017	2022
Population	51,847	52,744	50,669
Difference from Previous Five Years	-	897	2,075
Percent Total Change from Previous Five Years	-	+1.7%	-4%
Source: DOF 2021, DOF 2022			

Housing

As of January 1, 2022, there were 14,655 housing units in the city. The average household size in the city is 3.52 persons (DOF 2022). In the decade between 2012 and 2022, the number of housing units increased in the city by 534, including 262 single family units and 244 multi-family units (DOF 2021, 2022).

4.7.2 Regulatory Setting

a. State

Housing Crisis Act of 2019 (SB 330, Skinner)

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020 and extends until 2030.

Relocation Assistance: California Government Code Section 7261(a)

Section 7261(a) of the California Government Code requires that programs or projects undertaken by a public entity must be planned in a manner that (1) recognizes, at an early stage in the planning of the programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of these problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion. The displacing agency must ensure the relocation assistance advisory services are made available to all persons displaced by the public entity. If the agency determines that any person occupying property immediately adjacent to the property where the displacing activity occurs has caused substantial economic injury as a result of the displacement, the agency may also make the advisory services available to that person.

b. Regional

Association of Monterey Bay Area Governments 2045 Metropolitan Transportation Plan and Sustainable Communities Strategy

The Association of Monterey Bay Area Governments (AMBAG) serves as the Metropolitan Planning Organization and Council of Governments for Santa Cruz, Monterey, and San Benito counties. AMBAG provides population growth estimates within its jurisdiction, and distributes the state Regional Housing Needs Allocation (RHNA) to each city and county within Santa Cruz, Monterey, and San Benito counties. AMBAG's 2022 Regional Growth Forecast, adopted by the AMBAG Board of Directors in June 2022, provides population, housing, and employment forecasts for the AMBAG region through the year 2045.

AMBAG's 2045 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) consists of goals and strategies for how the Monterey Bay area jurisdictions can accommodate future growth and make the region more equitable and resilient in the face of unexpected challenges and achieve regional GHG emissions reduction targets established by the California Air Resources Board pursuant to Senate Bill 375.

c. Local

City of Watsonville 2005 General Plan

The City's 2005 General Plan, adopted in 1994, was prepared pursuant to State law to guide future development and to identify the community's environmental, social, and economic goals and functions as a blueprint that defines how the City will continue to evolve. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while at the same time integrating a range of State-mandated elements. The Growth and Conservation Element of the 2005 General Plan contains goals and policies related to orderly growth and urban development in Watsonville.

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting the housing needs identified in AMBAG's RHNA. The Housing Element identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy. The current 2015-2023 Housing Element

(responsive to the 5th RHNA cycle) was adopted by the City Council in 2016 and identifies 700 dwelling units as the RHNA for Watsonville.

City of Watsonville Municipal Code

Zoning regulations provide for the types and densities of residential and other uses permitted in each of the City's zoning districts. Zoning in the City establishes the maximum allowable development in a zoning district. Zoning also includes height limitations and other development standards which together regulate development standards, such as setbacks, building heights, floor area ratios, open space and parking for each parcel in the city, as applicable.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

The DWSP is a planning document to guide development; it does not propose specific development projects. Therefore, the following discussions provide program-level review of the potential impacts related to population and housing that could result from implementation of the DWSP. The methodology used for the analysis below is based on calculating the growth that would reasonably occur from implementation of the DWSP and comparing that to established growth forecasts for the City.

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would have a significant impact with respect to population and housing if it would:

- 1.) 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);
- 2.) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Initial Study (Appendix A) found impacts related to substantial displacement of people or housing would be less than significant because the DWSP would encourage a mix of housing types and increase the number of housing units in the plan area. Accordingly, Threshold 2 is not addressed further in this section.

b. Project Impacts and Mitigation Measures

Threshold 1: 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)?

Impact POP-1 **THE DWSP IS A PLAN FOR POPULATION GROWTH IN THE DOWNTOWN AREA OF WATSONVILLE. THEREFORE, THE PROJECT WOULD NOT INDUCE UNPLANNED POPULATION GROWTH, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

As described in Section 2, *Project Description*, the DWSP would facilitate the addition of 3,886 residential units and approximately 722,547 square feet of commercial, industrial, and civic uses over the 25-year planning horizon and beyond. Therefore, the project would directly induce growth in the downtown area. The average number of persons per household in Watsonville was 3.52 as of

January 2022 (DOF 2022); using this rate, the 3,886 residential units facilitated by the project would support an estimated 13,679 residents in the downtown area.¹ This analysis considers a conservative, maximum growth scenario in which every residential unit would be occupied by the existing average number of persons per household in Watsonville, and that all residents would be new residents who relocate to Watsonville. In reality, it is unlikely that residential development facilitated by the project would be occupied entirely by new residents who relocate to Watsonville; the residential units would likely support some mix of existing and new residents of Watsonville. However, the conservative, maximum growth scenario of 13,679 additional residents in the downtown area will be used in this analysis.

The City's 2005 General Plan does not provide growth projections beyond 2005; therefore, AMBAG population and housing projections were used to determine if growth facilitated by the DWSP would exceed anticipated growth in Watsonville. However, it can reasonably be assumed that a portion of the projected growth would likely occur without implementation of the DWSP since the City's current General Plan envisions downtown development as well.

AMBAG's 2022 Regional Growth Forecast provides growth projections for cities within Santa Cruz, Monterey, and San Benito counties. The City of Watsonville is anticipated to have a population of 56,344 people and 16,519 residential units by 2045, an increase of 5,675 residents and 1,864 residential units from 2022 (AMBAG 2022; DOF 2022). The growth envisioned in the DWSP is compared to AMBAG's Regional Growth Forecast for Watsonville below in Table 4.7-2.

Table 4.7-2 2045 Population and Housing Forecast for Watsonville

Category	Existing (2022) Conditions	AMBAG 2045 Forecast (2045 Conditions without Project)	Net Increase Anticipated by Project	2045 Conditions with Project	Net Exceedance of AMBAG 2045 Forecast
Population	50,669 people	56,344 people	13,679 people	64,348 people	8,004 people
Housing	14,655 units	16,519 units	3,886 units	18,541 units	2,022 units

Source: AMBAG 2022; DOF 2022

As shown in Table 4.7-2, the project would facilitate an increase of 13,679 people and 3,886 units by 2045, which would represent 8,004 people and 2,022 housing units beyond what is forecasted by AMBAG.

Although the project would exceed existing population and housing forecasts, the project itself anticipates and plans for this growth in downtown Watsonville. Several chapters of the DWSP provide guidance for development and growth within the downtown area, including Chapter 4, Mobility and Transportation; Chapter 5, Public Realm Improvements; Chapter 6, Land Use and Zoning; and Chapter 8, Infrastructure. These chapters establish guiding policies and goals for orderly development, and aim to ensure that growth does not outpace the capacity of existing infrastructure, services, and facilities. Chapter 4, Mobility and Transportation, outlines the vision and framework for improving and growing the pedestrian, bicycle, vehicle, and transit network in Watsonville, and Chapter 5, Public Realm Improvements, describes recommended improvements in the downtown area to enhance the pedestrian experience and link various areas of downtown Watsonville together.

¹ 3.52 people per unit X 3,886 units = 13,679 people

Chapter 6, Land Use and Zoning, would directly facilitate orderly development in downtown Watsonville by establishing standards and guidelines to regulate future development on privately-owned properties. Changes to existing land use and zoning designations are intended to deliver the physical outcomes envisioned for downtown Watsonville and would concentrate urban activity and intensity in the center of downtown while transitioning to lower-intensity uses at the edge of downtown. Finally, Chapter 8, Infrastructure, outlines recommended upgrades and improvements for the existing water, sewer, and stormwater systems in Watsonville to serve anticipated growth and development.

Overall, the project would facilitate an increase in population and housing units that exceeds existing growth projections. However, the DWSP anticipates and plans for this growth by establishing guiding policies and identifying recommended improvements to ensure the project facilitates orderly growth and development. Accordingly, the DWSP would not induce substantial unplanned growth, and this impact would be less than significant.

Mitigation Measures

Mitigation is not required.

Significance after Mitigation

Impacts would be less than significant without mitigation.

c. Cumulative Impacts

The cumulative impacts assessment area for population and housing is the area within the limits of the City of Watsonville. This is an appropriate cumulative impacts assessment area because the DWSP and the other reasonably foreseeable future projects listed in Table 3-1 would occur in the city limits and not contribute to growth beyond city limits.

The reasonably foreseeable future projects would include growth in the form of new structures and development as well as population growth from construction of new residential units. Some of the reasonably foreseeable future projects would not contribute to growth. For example, the Watsonville City Plaza Expansion and Revitalization Project would modify a plaza park, and not add development or people to Watsonville. However, other reasonably foreseeable future projects would increase population, such as the Hillcrest Subdivision project, which would add residential units to cumulative impacts assessment area. Another example, the Freedom Campus Master Plan project envisions up to 160 residential units on a parcel approximately 4,700 feet north-northwest of the plan area within the city limits. However, the City continues to refer to its General Plan and zoning ordinance to permit and plan development, including the reasonably foreseeable future projects. Additionally, the reasonably foreseeable future projects do not include development projects that would result in substantial growth, but rather are relatively small projects that would incrementally increase population. The reasonably foreseeable future projects also are generally on sites without existing housing units, and therefore, would not displace substantial numbers of people or housing. Cumulative impacts related to substantial unplanned growth or displacement would be less than significant.

Implementation of the DWSP would contribute to increasing population and housing units within the City. Because the DWSP plans for this growth it would not result in substantial unplanned growth, even when combined with the other reasonably foreseeable future projects. Therefore, the DWSP would not result in a cumulatively considerable contribution to unplanned growth.

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4.8 Transportation

This section evaluates the potential transportation impacts of the DWSP, including conflicts with existing programs, plans, ordinances, or policies addressing the circulation system; conflicts with *CEQA Guidelines* section 15064.3(b); increased hazards due to geometric design features; and inadequate emergency access.

Both the setting and the impacts analysis in this section are based on a Transportation Impact Analysis prepared for the DWSP by Kimley Horn in March 2023. The report is included as Appendix E.

4.8.1 Setting

a. Roadway Network

Regional

The hierarchy of streets in Watsonville provide various levels of access and mobility, with regional highways accommodating the highest volumes and speeds, major cross-town arterial streets connecting to freeways and operating at moderate speeds and/or volumes, and local access roads that link neighborhoods, parks, and schools to the cross-town streets and to each other, with many of these serving adjacent development and neighborhoods. State Route (SR) 1, SR 129, and SR 152 are the primary routes connecting the City of Watsonville to the region and are identified as essential roadways for the country's economy and mobility by the Federal Highway Administration.

State Route 1 is a major north-south state highway extending from Orange County to Mendocino County along California's coastline. Near and through Watsonville, SR 1 has two to three lanes and generally travels north-south along the City's western boundary.

State Route 129 is a generally east-west state highway extending from its interchange with SR 1 immediately southwest of Watsonville to its interchange with US Highway 101 north of San Juan Bautista. Near and through Watsonville, SR 129 travels generally southwest-northeast along the City's southern boundary, following the Pajaro River.

State Route 152 is a generally east-west major state highway, extending from its interchange with SR 1 in western Watsonville to SR 99 near Merced. SR 152 provides regional access to US Highway 101 in Gilroy and Interstate 5 west of Los Banos. Within Watsonville, SR 152 connects to SR 1 near the western boundary of the city and travels southeast as Main Street. In the downtown area, SR 152 continues northwest as Lake Avenue and exits the city toward the community of Interlaken.

Plan Area

Major streets in the DWSP plan area are described below. Residential areas within the plan area are served by local roadways generally organized in grid patterns.

Main Street overlaps with SR 152 from its interchange with SR 1 in western Watsonville to its intersection with Freedom Boulevard, and then turns south. SR 152 pivots northwest while Main Street continues to the City's southern boundary along the Pajaro River. Within downtown Watsonville, Main Street has two travel lanes in both directions and intermittently has a two-way left turn lane in the center of the roadway.

Riverside Drive is an east-west major arterial providing access to industrial, commercial, and residential uses within the plan area. Riverside Drive is part of the state highway system as SR 129 and spans from SR 1 to the west and SR 101 to the east. Riverside Drive is a four-lane roadway east of the SR 1 northbound ramp intersection and two-lane roadway west of the SR 1 southbound ramp intersection.

Beach Street extends from its terminus along the Pacific Ocean to the west to its intersection with Hushbeck Avenue in eastern Watsonville. Beach Street is known as West Beach Street west of Main Street and East Beach Street east of Main Street. West Beach Street is a two-way street with one travel lane in each direction and exits the city north of the SR 1 and SR 129 interchange. East Beach Street is a two-lane, one-way street that travels northeast until Hushbeck Avenue.

Lake Avenue extends from its intersection with Walker Street in southwestern Watsonville and travels northwest until its intersection with Carlton Road in the community of Interlaken northeast of Watsonville, where it becomes Hecker Pass Road. East Lake Avenue, as it is known east of Main Street is also SR 152. Within downtown Watsonville, East Lake Avenue is a two to three lane one way street traveling west, and West Lake Avenue (west of Main Street) becomes a two way street west of its intersection with Rodriguez Street.

Union Street is a north-south minor arterial providing access to residential uses, commercial uses and public building uses including the Watsonville Police Department. Union Street is one lane in each direction and spans from Front Street to the south and transitions into Brennan Street to the north at East Lake Avenue. Brennan Street then terminates at Gonzales Street just north of Freedom Boulevard.

Rodriguez Street is a north-south minor arterial providing access to residential uses to the north and commercial as well as building uses to the south including United States Postal Service, and the Superior Court of California County of Santa Cruz. The roadway connects to Front Street to the south and Main Street to the north. Within the plan area, Rodriguez Street is one lane in each direction, except between West Beach Street and West Lake Avenue where there are two lanes in each direction.

Brennan Street is a north-south collector providing access to residential uses to the east and commercial uses to the west. The roadway connects to Gonzales Street to the north and transitions into Union Street to the south. Within the plan area, Brennan Street is one lane in each direction.

5th Street is a discontinuous east-west local street providing access to mainly residential land uses with some commercial uses near Main Street. 5th Street is a two-lane roadway that connects to Walker Street to the west and extends just past Brewington Avenue to the east.

PEDESTRIAN AND BICYCLE FACILITIES

Sidewalks are consistently available throughout the DWSP plan area along neighborhood streets and major streets such as Main Street, Beach Street, Lake Avenue, 5th Street, and others. These major streets have sidewalks on both sides of the roadway in the plan area and have sidewalks on at least one side of the roadway as they approach City boundaries, moving outward from the plan area. In addition to on-street facilities, the City of Watsonville maintains approximately 10 miles of slough and levee trails along Struve Slough, Watsonville Slough, the Pajaro River, and Salsipuedes Creek (City of Watsonville 2012).

Four categories of bikeways are specified in the Caltrans Highway Design Manual and Sections 885.1 et seq. of the California Streets and Highways Code. These categories are:

- **Class I Bikeway (Bike Path):** Bike paths provide a completely separate right-of-way and are designated for the exclusive use of people riding bicycles and walking with minimal cross-flow traffic.
- **Class II Bikeway (Bike Lane):** Bike lanes provide designated street space for bicyclists, typically adjacent to the outer vehicle travel lanes. Bike lanes include special lane markings, pavement legends, and signage. Bike lanes may be enhanced with painted buffers between vehicle lanes and/or parking, and green paint at conflict zones (such as driveways or intersections).
- **Class III Bikeway (Bike Route):** Bike routes provide enhanced mixed-traffic conditions for bicyclists through signage, striping, and/or traffic calming treatments, and provide continuity to a bikeway network. Bike routes are typically designated along gaps between bike trails or bike lanes, or along low-volume, low-speed streets. Bicycle boulevards provide further enhancements to bike routes by encouraging slow speeds and discouraging non-local vehicle traffic, often through the use of traffic calming. Bicycle boulevards can also feature special wayfinding signage to nearby destinations or other bikeways.
- **Class IV Bikeway (Separated Bikeway):** Separated Bikeways, also referred to as cycle tracks or protected bikeways, are bikeways for the exclusive use of bicycles which are physically separated from vehicle traffic. Separations may include grade separation, flexible posts, physical barriers, or on-street parking.

The plan area contains Class I, Class II, and Class III bikeways. Specifically, within the plan area, Class I, Class II, and Class III bikeways are provided along the following corridors:

Class I bikeways:

- Main Street from Pennsylvania Drive to Freedom Boulevard

Class II bikeways:

- W. Beach Street from SR 1 to Walker Street
- Walker Street from Harkins Slough Road to Riverside Drive
- Rodriguez Street from Main Street to Riverside Drive
- Freedom Boulevard from Main Street to High Street

Class III bikeways:

- Main Street from Freedom Boulevard to Riverside Drive
- W. Beach Street from Walker Street to Lincoln Street
- Riverside Drive from Walker Street to Bronte Avenue
- Lincoln Street from Riverside Drive to Freedom Boulevard

Existing bicycle facilities in the plan area are shown on Figure 2-8 in Section 2, *Project Description*, this EIR.

TRANSIT SERVICE

Santa Cruz Metro provides transit services in the plan area. In addition, the Monterey-Salinas Transit operates a bus line between the City of Salinas and Watsonville. Table 4.8-1 provides a summary of

the existing transit in the plan area. A detailed description of each transit route in Table 4.8-1 is provided in the Transportation Impact Analysis (Appendix E).

Table 4.8-1 Summary of Existing Transit

		Weekdays		Weekends	
Route	Description	Operating Hours	Headway (Minutes)	Operating Hours	Headway (Minutes)
Santa Cruz Metro					
69W	Capitola/Cabrillo	6:37 AM – 10:28 PM	60	7:50 AM – 7:40 PM	60
69A	Capitola/Airport	6:20 AM – 6:56 PM	60	8:07 AM – 7:52 PM	60
71	Soquel Freedom	5:40 AM – 12:40 AM	30	5:58 AM – 12:40 PM	30-60
91X	Cabrillo Express	5:50 AM – 5:22 PM	60-120	–	–
72	Green Valley-Hospital	6:45 AM – 6:40 PM	60	–	–
72W	Green Valley-Corralitos	–	–	9:25 AM – 6:27 PM	120
74S	PVHS/Hospital	7:00 AM – 8:02 AM 3:05 PM – 4:00 PM	–	–	–
75	Green Valley-Wheelock	5:15 AM – 7:15 PM	60	6:05 AM – 6:45 PM	70
79	East Lake/Crestview	7:25 AM – 6:00 PM	60	8:30 AM – 5:14 PM	120
WC	Watsonville Circular	8:44 AM – 4:17 PM	60	8:44 AM – 4:14 PM	60
Monterey-Salinas Transit					
27	Watsonville-Marina	6:53 AM – 7:48 PM	60	–	–
28	Watsonville-Salinas (via Castroville)	6:45 AM – 7:30 PM	120	6:45 AM – 7:30 PM	120
29	Watsonville-Salinas (via Prunedale)	5:45 AM – 6:50 PM	120	7:34 AM – 8:00 PM	120

Source: Transportation Impact Analysis (Kimley-Horn 2023) (See Appendix E)

Note: Headway is defined as the time between transit vehicles on the same route.

The Watsonville Transit Center, located on the corner of Rodriguez Street and West Lake Avenue in the plan area, provides inter- and intra-city transit connections for the plan area. The Transit Center is served by Santa Cruz METRO’s fixed-route and paratransit services, in addition to a limited number of Monterey-Salinas Transit fixed-route and Greyhound bus services.

4.8.2 Regulatory Setting

a. Federal Regulations

Americans with Disabilities Act of 1990

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the United States Access Board, an independent Federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last decade. The guidelines, last revised in

July 2011, address various issues, including roadway design practices, slope and terrain issues, pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.

Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency of the United States Department of Transportation responsible for the federally funded roadway system, including the interstate highway network and portions of the primary State highway network. FHWA funding is provided through the Fixing America's Surface Transportation Act. Federal funds can be used to fund eligible local transportation improvements in such as projects to improve the efficiency of existing roadways, traffic signal coordination, bikeways, pedestrian facilities, and transit system upgrades.

b. State Regulations

Senate Bill 743

On September 27, 2013, the governor signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reductions of greenhouse gas emissions. In December 2018, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommends using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance no later than July 1, 2020.

At the same time as the release of the updated *CEQA Guidelines*, OPR also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State's greenhouse gas emissions reductions targets.¹

Senate Bill 32 and Senate Bill 375

On September 8, 2016, the governor signed SB 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the 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, and implementation of recently adopted policies and legislation.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach GHG emissions goals by directing the California Air Resources

¹ OPR. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf (accessed March 2022).

Board to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations.

California Department of Transportation Planning Documents

Caltrans is responsible for planning, designing, constructing, operating, and maintaining the State highway system. Federal highway standards are implemented in California by Caltrans. Any improvements or modifications to the highway system, including ramps and access points, within the study area would need to be approved by Caltrans. The following Caltrans planning documents emphasize the State of California's focus on transportation infrastructure that supports mobility choice through multimodal options, smart growth, and efficient development.

- Smart Mobility 2010: A Call to Action for the New Decade (Smart Mobility Framework)
- Complete Streets Implementation Action Plan
- Strategic Plan 2020-2024
- California Transportation Plan 2050

Smart Mobility Framework

The purpose of the Smart Mobility Framework, published in February 2010, is to address the State mandate to find solutions to climate change, reduce per capita VMT, and create a safe and equitable transportation system.² The Smart Mobility Framework includes ten implementing themes to achieve its purpose, including integration into Caltrans and other transportation agencies' policy and practice, collection of data and tools to implement the Smart Mobility Framework, undertaking of major cross-functional initiatives, and integration into local government land use and transportation planning.

Complete Streets Implementation Action Plan

On September 30, 2008, the California Complete Streets Act of 2008 was signed into law. AB 1358 requires any substantive revision of the circulation/mobility element of a city or county's general plan to identify how they will safely accommodate the circulation of all users of the roadway including pedestrians, bicyclists, children, seniors, individuals with disabilities, and transit riders, as well as motorists.

Caltrans Deputy Directive 64-R1: Complete Streets – Integrating the Transportation System

In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the State. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. Deputy Directive 64-R1 states:

The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."

² Caltrans. 2010. Smart Mobility 2010. February 2010. <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/smf-handbook-062210-a-a11y.pdf> (accessed April 2022).

Successful long-term implementation of this directive is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.

Director's Policy 22: Director's Policy on Context Sensitive Solutions

Director's Policy 22, a policy regarding the use of "Context Sensitive Solutions" on all State highways, was adopted by Caltrans in November of 2001. The policy reads:

The Department uses "Context Sensitive Solutions" as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals. Context sensitive solutions are reached through a collaborative, interdisciplinary approach involving all stakeholders.

The context of all projects and activities is a key factor in reaching decisions. It is considered for all State transportation and support facilities when defining, developing, and evaluating options. When considering the context, issues such as funding feasibility, maintenance feasibility, traffic demand, impact on alternate routes, impact on safety, and relevant laws, rules, and regulations must be addressed.

The policy recognizes that "in towns and cities across California, the State highway may be the only through street or may function as a local street," that "these communities desire that their main street be an economic, social, and cultural asset as well as provide for the safe and efficient movement of people and goods," and that "communities want transportation projects to provide opportunities for enhanced non-motorized travel and visual quality." The policy acknowledges that addressing these needs will assure that transportation solutions meet more than just traffic and operational objectives.

Director's Policy 37: Director's Policy on Complete Streets

Caltrans Director's Policy 37, a policy calling for new transportation projects on State highways to include "complete street" features that provide safe and accessible options for people walking, biking and taking transit, was adopted by Caltrans in December 2021. The policy reads:

The Department recognizes that walking, biking, transit, and passenger rail are integral to our vision of delivering a brighter future for all through a world-class transportation network. Additionally, Caltrans recognizes that streets are not only used for transportation but are also valuable community spaces. Accordingly, in locations with current and/or future pedestrian, bicycle, or transit needs, all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved. When decisions are made not to include complete streets elements in capital and maintenance projects, the justification will be documented with final approval by the responsible District Director.

Opportunities for complete streets exist in all phases of project development from planning and design to construction, operations, and maintenance. Complete streets projects should prioritize underserved communities that have been historically harmed and segmented by the

transportation network and should serve people of all ages and abilities. Furthermore, Caltrans commits to removing unnecessary policy and procedural barriers and partnering with communities and agencies to ensure projects on local and state transportation systems improve the connectivity to existing and planned pedestrian, bicycle, and transit facilities, and accessibility to existing and planned destinations, where possible.

This policy is intended to expand the availability of sustainable transportation options to help meet the state's climate, health and equity goals.³

Strategic Plan 2020-2024

Caltrans' 2020-2024 Strategic Plan weaved sustainability principles through all of its goals. Goals of the Strategic Plan are related to safety, enhancing and connecting the multimodal transportation network, lead climate action, and advancing equity in all communities.⁴

California Transportation Plan 2050

Caltrans completed the California Transportation Plan to comply with Title 23, Code of Federal Regulation Section 450.214 and pursuant to California Government Code Title 7 Division 1 Chapter 2.3. The California Transportation Plan provides a roadmap for making effective, equitable, transparent, and transformational transportation decisions in California. The vision of the California Transportation Plan is: "California's safe, resilient, and universally accessible transportation system supports vibrant communities, advances racial and economic justice, and improves public and environmental health," which is supported by goals related to safety, climate, equity, accessibility, public health, economy, environment, and infrastructure.⁵

California Encroachment Permits

Work within the existing Caltrans right of way must comply with Caltrans permitting requirements. This includes a traffic control plan that adheres to the standards set forth in the California Manual of Uniform Traffic Control Devices (MUTCD). As part of these requirements, there are provisions for coordination with local emergency services, training for flagmen for emergency vehicles traveling through the work zone, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers.

c. Regional and Local Regulations

Santa Cruz County Regional Transportation Plan

The 2045 Santa Cruz Regional Transportation Plan (Santa Cruz County Regional Transportation Commission 2022) is a comprehensive planning document that provides guidance for transportation policy and projects through the year 2045. The goals of the 2045 Santa Cruz Regional Transportation Plan include:

³ Caltrans. 2021. News Release: Caltrans to Require 'Complete Streets' Features in Planning and Design of All New Projects. <https://dot.ca.gov/news-releases/news-release-2021-039> (accessed April 2023)

⁴ Caltrans. 2021. Caltrans 2020-2024 Strategic Plan. <https://dot.ca.gov/-/media/dot-media/programs/risk-strategic-management/documents/sp-2020-16p-web-a11y.pdf> (accessed April 2022).

⁵ Caltrans. 2021. California Transportation Plan 2050. February 2021. <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf> (accessed April 2022).

- Establish livable communities that improve people’s access to jobs, schools, recreation, healthy lifestyles and other regular needs in ways that improve health, reduce pollution and retain money in the local economy;
- Reduce transportation related fatalities and injuries for all transportation modes; and
- Deliver access and safety improvements cost effectively, within available revenues, equitably and responsive to the needs of all users of the transportation system and beneficial for the natural environment.

The 2045 Santa Cruz County Regional Transportation Plan identifies measurable outcomes, called targets that are each linked to a sustainability goal. There are many targets in the Regional Transportation Plan. Examples of some targets include:

- Increase the length of urban bikeway miles relative to total urban arterial and collector roadway miles to 85 percent by 2030 and to 100 percent by 2045;
- Reduce per capita VMT by 4 percent by 2030 and by 10 percent by 2045 compared to 2005 VMT;
- Decrease single occupancy commute trip mode share by 6.5 percent by 2030 and by 10 percent by 2045 compared to 2020; and
- Reduce the number of transit vehicles in “distressed” condition to 20 percent by 2030 and to 10 percent by 2045.

Analyzing Vehicle Miles Traveled for CEQA Compliance

The City adopted *Analyzing Vehicle Miles Traveled for CEQA Compliance: SB 743 Implementation Guidelines for the City of Watsonville* in September 2022. The document was developed to serve both as the basis of SB 743 implementation in Watsonville and VMT analysis within Watsonville. The document provides instruction and guidance on evaluating the VMT of both land-use development and transportation projects. The document also provides screening criteria for VMT impacts.

City of Watsonville Vision Zero Action Plan 2021

Vision Zero is a global strategy to eliminate all traffic fatalities and severe injuries to ensure safe, healthy, equitable mobility for all. In January 2018, the Watsonville City Council adopted a resolution that outlines how the City can draw upon existing resources to successfully implement Vision Zero. Following that, the City adopted the *City of Watsonville Zero Action Plan 2021* (City of Watsonville 2021). The City’s Vision Zero Action Plan acknowledges that traffic deaths and severe injuries are preventable. The goal is to eliminate both in a set time frame with clear, measurable, and timely strategies. The Action Plan sets forth action items to achieve this goal. There are many actions items. Examples of some action items include:

- Provide schools with bicycle safety equipment, such as bicycle helmets;
- Work with State legislators to support reducing roadway speed limits;
- Develop and incorporate Complete Streets into projects;
- Prioritize the development of safe roadways and the highest level of safety for all road users through new policies, systems, and infrastructure improvements for pedestrians, bicyclists, and motorists; and
- Explore new approaches to infrastructure enhancements, including speed cameras, sidewalk decals, and pedestrian crosswalk flags.

City of Watsonville Trails & Bicycle Master Plan for the Watsonville Scenic Trails Network

The *City of Watsonville Trails & Bicycle Master Plan for the Watsonville Scenic Trails Network* (City of Watsonville 2012) includes designations of the routes along roadways that can be used by bicycling commuters and recreational riders for safe access to major employers, shopping centers and residential areas.

City of Watsonville 2005 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:

- **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.
 - **Implementation 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 and 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.
 - **Implementation Measure 4.I.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.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The DWSP is a planning document to guide development; it does not propose specific development projects. Therefore, the following discussions provide program-level review of the potential transportation impacts that could result from implementation of the DWSP.

The analysis presented herein is derived primarily from a Transportation Impact Analysis prepared by Kimley Horn for the proposed project, included as Appendix E to this EIR. The Transportation Impact Analysis, dated March 2023, assesses the transportation impacts of the project, including impacts to transit and active transportation facilities and VMT. The Transportation Impact Analysis also discloses the LOS, or traffic delay, that would result from the project at nearby roadway intersections. Pursuant to Section 15064.3 of the State *CEQA Guidelines*, traffic delay resulting from a land use project shall not constitute a significant environmental impact for purposes of CEQA. Because this EIR is intended to identify and mitigate potentially significant impacts of the proposed project, LOS is not discussed in the impact analysis.

The Transportation Impact Analysis evaluates potential VMT impacts of the buildout or growth projections of the DWSP. In order to evaluate the potential VMT of the DWSP, the zoning for the DWSP, based on proposed land use designation, was entered into the Santa Cruz County Travel Demand Model. This dataset relied on land use growth projections developed as part of the DWSP and presented in Table 2-1 in Chapter 2, *Project Description*, of this EIR. While the Travel Demand Model uses dwelling units as its input, there is no differentiation between single-family and multi-family residential in terms of vehicle trip generation and distribution. Therefore, the trip generation and travel characteristics in the Travel Demand Model are not sensitive to the type of residential units. The Travel Demand Model also represents nonresidential land uses as number of jobs rather than square footage of development. Therefore, the non-residential growth envisioned in the DWSP was converted into number of jobs from building square feet using the rates from the Institute of Transportation Engineers Trip Generation Manual 11th Edition. As detailed in the Transportation Impact Analysis, the non-residential growth envisioned in the DWSP converts to approximately 1,416 jobs. Note that the growth between the base year of the Travel Demand Model (2019) and future year (2040) was replaced by the growth envisioned in the DWSP.

The VMT for the residential land uses was computed by combining the production VMT for all home-based trip purposes. VMT for non-residential land uses was computed from the attraction home-based work VMT. The external VMT for residential land uses was determined by multiplying the calibrated external trip distance by transportation analysis zone (TAZ) determined using big data (Teralytics) by the total internal-external (I-X) home-based trips for that TAZ. The external VMT for

non-residential land uses was determined by multiplying the calibrated external trip distance by TAZ determined previously by the total internal-external (I-X) home-based work trips for that TAZ.

To determine the share of the non-residential VMT for the office and industrial land uses, the total number of trips attracted to each TAZ were calculated by multiplying the Travel Demand Model's underlying trip generation rate for the home-based work trip purpose by employment type. The office land use share of the total VMT was then calculated by dividing the number of trips generated from office employment by the total number of home-based work trips calculated using the trip generation rates. The VMT for the office land uses was calculated by multiplying the office land use share by the total home-based work VMT (including External VMT). Similarly, the VMT for the industrial land uses was calculated by multiplying the industrial land use share by the total home-based work VMT (including External VMT).

Finally, residential VMT per capita and office/industrial VMT per employee for each TAZ were computed by dividing the residential and office/industrial VMT by TAZ by the total population or total office/industrial employees, respectively. A VMT per capita and VMT per employee weighted average was calculated for the TAZs comprising proposed DWSP based on population and employment, respectively.

Significance Thresholds

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant impacts related to transportation if it would:

- 1.) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- 2.) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- 3.) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment);
- 4.) Result in inadequate emergency access.

The Initial Study (Appendix A) found that the DWSP would have no impacts related to increased transportation hazards or inadequate emergency access. Therefore, Threshold 3 and Threshold 4 are not studied further in this section.

Section 15064.3 of State *CEQA Guidelines*, referenced in Threshold 3 above, pertains to VMT. Per the City's VMT analysis guidelines, the significance threshold for residential- and employment-based VMT uses is set at 15 percent below the regional average VMT. For the purposes of this analysis, the region is defined as Santa Cruz County. According to the Transportation Impact Analysis provided as Appendix E to this EIR, the VMT thresholds by land-use type are:

- 8.9 miles per capita for residential uses;
- 7.4 miles per employee for office uses; and
- 11 miles per employee for industrial uses.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
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Impact TRA-1 THE DWSP WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL ENVIRONMENTAL EFFECTS WOULD OCCUR. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Transit

The DWSP would not result in a disruption of existing transit; rather, it would locate more residents near transit facilities and thereby increase ridership. In addition, according to the Transportation Impact Analysis (Appendix E), transit is expected to be improved in the future by expanding the speed and frequency of fixed-bus routes and enhancing access from connecting pedestrian and bicycle improvements to bus stops, encouraging new developments near transit, and improving amenities at bus stops. The DWSP includes specific goals (Goal #12) related to transit that call for leveraging and supporting existing transit service to help realize downtown's potential to become a multi-modal mixed-use district. Therefore, the DWSP would not conflict with the City's adopted plans and policies as it relates to transit facilities. Impacts related to conflicts with transit access and circulation would be less than significant.

Roadway

The DWSP envisions modifications to the roadway network within the plan area, such as a road diet along Main Street⁶ and the elimination of the one-way couplet of East Beach Street and East Lake Avenue. As traffic flows increase and shift, it is common for traffic at intersections to experience lower travel speeds and increased delays, which, in part, is the purpose of implementing a road diet and eliminating one-way couplets. Vehicles traveling through the plan area would change their travel patterns based on the reconfiguration of the roadways and some spill over could occur on roadways parallel to these modifications, such as Rodriguez Street. The DWSP also envisions roadway improvements or modifications that would improve traffic circulation. For example, the DWSP envisions the installation of a roundabout at Freedom Boulevard and Main Street. According to Caltrans, roundabouts improve traffic flow by allowing vehicles to move through intersections without stopping, while also improving safety compared to a traditional intersection without a roundabout (Caltrans 2017). Accordingly, impacts related to conflicts with roadway access and circulation would be less than significant.

Bicycle

A Class I bicycle facility currently exists on Main Street and Class II bicycle facilities currently exist on Rodriguez Street, Walker Street and Freedom Boulevard. These facilities are envisioned to expand as part of the DWSP. The DWSP does not envision features that would disrupt the existing and future bicycle facilities adjacent and near the plan area. The DWSP includes specific goals (e.g., Goal #10) that call for providing convenient access and circulation for all modes of transportation and

⁶ In response to Council support for integrating complete streets infrastructure on State Route 152 (Resolution No. 195-22), Caltrans will be including the "road diet" concept—i.e., reducing the number of travel lanes for Main Street from four to three with a center running left turn lane (or landscaped median) and one travel lane in each direction—and other complete streets recommendations into their upcoming State Highway Operation and Protection Program (SHOPP) project no. 05-1P110.

enhancing bicycling in the plan area. Therefore, the DWSP would not conflict with the City's adopted plans and policies as it relates to bicycle facilities. Impacts related to conflicts with bicycle access and circulation would be less than significant.

Pedestrian

The DWSP identifies opportunities to expand the pedestrian realm with parklets and curb extensions, and to increase the permeability of the Downtown street network with paseos. The DWSP includes pedestrian network improvements to address the need for safer, more visible crossings on high-speed, high-volume arterial streets and comfortable off-street facilities that provide alternative access routes to local amenities. Underutilized alleyways and spaces between buildings are recommended to be repurposed to create a paseo network, which would provide pedestrians alternative paths to travel around Downtown. Upgrades at major intersections such as Main Street and East Lake Avenue may include curb extensions, crosswalk visibility enhancements, and leading pedestrian intervals are recommended in the DWSP. The future pedestrian facilities improvements envisioned in the DWSP would not conflict with the existing or planned pedestrian facilities because they would either tie into or replace existing facilities. The DWSP includes specific goals (e.g., Goal #10) that call for improving pedestrian facilities to improve safe and efficient pedestrian circulation in the plan area. The DWSP includes roadway modifications that would improve pedestrian safety. For example, the DWSP envisions converting East Lake Avenue and East Beach Street, which currently operate as one-way couplets, into two-way streets. The existing coupled one-way configuration was designed to move vehicle traffic at consistent speeds in and out of the downtown area. The conversion to two-way streets would slow traffic, making it safer for pedestrians crossing East Lake Avenue and East Beach Street. The conversion of these streets would also add a central turning lane, which would also serve as pedestrian refuge when crossing these streets. Therefore, the DWSP would not conflict with the City's adopted plans and policies as it relates to pedestrian facilities. Impacts related to conflicts with pedestrian access and circulation would be less than significant.

In summary, the DWSP would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities such that substantial physical environmental effects would occur. Impacts would be less than significant.

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 DEVELOPMENT ENVISIONED IN THE DWSP WOULD CONFLICT WITH OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The development envisioned in the DWSP would result in increased population and employment in the plan area. While people residing in the plan area would be in proximity to other land uses, such as retail and office, it is reasonable to assume some residents would use vehicles to travel to destinations outside of the plan area. Accordingly, the development envisioned in the DWSP would generate vehicles trips and VMT.

Using the methodology described in the Transportation Impact Analysis (see Appendix E) and summarized above in *a. Methodology and Significance Thresholds*, the VMT result from the DWSP was estimated. Table 4.8-2 summarizes the VMT per capita and the VMT per employee for the proposed DWSP. As shown in Table 4.8-2, for Existing Plus DWSP scenario, the residential land uses

would result in a VMT per capita that is below the City's established threshold. As shown in Table 4.8-2, development envisioned in the DWSP would result in a reduction of VMT per employee (office and industrial) compared to existing conditions. However, the amount of reduction would not reduce VMT below the City's threshold of 15 percent below the regional average VMT. As shown in Table 7, the VMT per Employee (office and industrial) for Existing Plus DWSP would exceed the significance threshold. Accordingly, impacts would be potentially significant.

Table 4.8-2 VMT by DWSP Land Use

Scenario	VMT Per Capita (Residential)	VMT Per Employee (Office)	VMT Per Employee (Industrial)
2019 Existing Conditions	9.4	9.6	14.2
2019 Existing Conditions Plus DWSP	7.9	9.0	13.5
<i>Significance Threshold</i>	<i>8.9</i>	<i>7.4</i>	<i>11.0</i>
Threshold Exceeded?	No	Yes	Yes

Source: Kimley-Horn 2023 (see Appendix E)

As previously noted, the retail land uses envisioned in the DWSP were analyzed qualitatively. Local serving retail primarily serves pre-existing shopping needs in the community (i.e., they do not generate new trips because they meet existing demand). Because of this, local-serving retail uses can be presumed to reduce trip lengths when a new store is proposed. Essentially, the assumption is that someone would travel to a newly constructed local serving store, such as a coffee shop, restaurant, clothing store, or other type of commercial business because it is nearby. Proximity is the main factor, rather than a proposed retail store fulfilling an unmet need (i.e., the person has an existing need that was met by the retail located further away and is now traveling to the new retail use because it is closer to the person's origin location). This results in a trip on the roadway network becoming shorter, rather than a new trip being added to the roadway network, which would result in new or more VMT. Conversely, residential and office land uses often drive new trips given that they introduce new participants to the transportation system. The City of Watsonville SB 743 Implementation Guidelines provides for a general threshold of 50,000 square-feet as an indicator as to whether a retail store can be considered local serving or not. Based on the understanding that no single store within the estimated 875,000 square feet of retail development envisioned in the DWSP would exceed 50,000 square feet, the envisioned retail development would not result in a net increase in VMT and would therefore not result in a significant impact. Retail stores exceeding 50,000 square feet are generally categorized as big-box retail shops which are not envisioned for the plan area or in the DWSP.

In summary, the residential and retail development envisioned in the DWSP would not exceed VMT significance thresholds. However, the office and industrial development envisioned in the DWSP would exceed VMT significance thresholds. Therefore, the DWSP would have a significant impact related to VMT and conflicts with *CEQA Guidelines* section 15064.3, subdivision (b).

Mitigation Measures

TRA-1 Transportation Demand Management Program

Each individual office and industrial development project in the DWSP plan area shall have a corresponding transportation demand management (TDM) plan and monitoring program developed by the applicant or developer of the project. This plan shall identify the TDM reductions specific to

their project. The monitoring program shall establish goals and policies to ensure the efficient implementation of the TDM plan and demonstrate its effectiveness at reducing VMT such that VMT is below the significance thresholds presented in Table 4.8-2, above. Examples of TDM measures that could be employed, depending on specific project conditions and circumstances, include reduced parking supply, new transit stops, emergency ride home programs, bike-share programs, and traffic calming improvements.

Significance After Mitigation

The DWSP does not involve individual development projects and therefore is evaluated at a programmatic level in this EIR and in the Transportation Impact Analysis (Appendix E). Given the programmatic level data that is available for the DWSP, a detailed TDM plan typically required for each individual project cannot be developed at this stage. Therefore, the effect of project-level and specific TDM programs that could reduce VMT cannot be accounted for fully as part of this analysis. For this reason, it cannot be guaranteed that VMT associated with future office and industrial development pursuant to the DWSP could be reduced below relevant significance thresholds. As such, the VMT impact of the DWSP would be significant and unavoidable.

It should be noted that the City has an established VMT banking program as part of its recently adopted VMT policy, which could be used to mitigate the VMT impacts of specific and individual projects. However, the VMT banking program is early in its development and implementation so the impact on VMT mitigation of such a program is still being determined by the City. Therefore, the use of the VMT banking programs as feasible mitigation for the VMT impacts of the DWSP would be reassessed over time.

c. Cumulative Impacts

IMPACT TRA-C1: THE DWSP WOULD HAVE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO A SIGNIFICANT CUMULATIVE VMT IMPACT RELATED TO A CONFLICT OR INCONSISTENCY WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B).

The cumulative impact assessment area for transportation consists of two separate areas. The area for assessing impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities consists of the city limits of Watsonville. This is appropriate for this impact analysis because the potential conflicts of the DWSP and these types of programs and plans would be limited to local streets and facilities on these streets, such as sidewalks, bicycle lanes, and transit stops. The cumulative impact assessment area for VMT impacts related to a conflict or inconsistency with *CEQA Guidelines* section 15064.3, subdivision (b) consists of Santa Cruz County. This is an appropriate area for this impact analysis because the Travel Demand Model used to model VMT is based on county-wide travel patterns and the City's VMT thresholds are also based on regional averages (regional is the entire County).

The reasonably foreseeable future projects in the cumulative impact assessment area (see Table 3-1 in Section 3, *Environmental Setting*) would include new roadways, pedestrian facilities, and bicycle lanes. For example, the Hillcrest Estates project would involve new internal access roads and sidewalks that connect to the existing roadway and pedestrian network. As part of design review and the entitlement process, this project and other cumulative projects have or would be required to meet City roadway, sidewalk, and bicycle lane specifications and standards. The cumulative projects have generally been designed to either add to or blend into the existing pedestrian and bicycle lane network, consistent with City and State policies and guidance to reduce VMT and

increase transportation safety. While some cumulative projects would be proximate to transit routes and stops, they would not require removal of transit stops. Therefore, cumulative impacts related to potential conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would be less than significant.

The Transportation Impact Analysis (Appendix E) modeled the VMT of the DWSP in 2040 using the methodology described above in *a. Methodology and Significance Thresholds*. Rather than modeling each of the reasonably foreseeable future projects in the cumulative impact assessment area, the analysis used the TDM which models buildout of Santa Cruz County in 2040. Table 4.8-3 summarizes the VMT per capita and the VMT per employee for the proposed DWSP under future cumulative conditions in 2040.

Table 4.8-3 Cumulative VMT by DWSP Land Use

Scenario	VMT Per Capita (Residential)	VMT Per Employee (Office)	VMT Per Employee (Industrial)
2019 Existing Conditions	9.4	9.6	14.2
2040 Future Conditions Plus DWSP VMT	7.4	8.5	12.8
<i>Significance Threshold</i>	<i>8.9</i>	<i>7.4</i>	<i>11.0</i>
Threshold Exceeded?	No	Yes	Yes

Source: Kimley-Horn 2023 (see Appendix E)

As shown in Table 4.8-3, VMT across all land use scenarios would decrease from cumulative development compared with existing conditions. However, with the exception of residential land uses, cumulative office and industrial development would still exceed VMT significance thresholds in 2040. Accordingly, cumulative VMT impacts related to a conflict or inconsistency with *CEQA Guidelines* section 15064.3, subdivision (b) would be potentially significant. The DWSP would result in a cumulatively considerable contribution to this significant cumulative impact because it would add VMT that exceeds thresholds, even in future cumulative conditions.

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4.9 Tribal Cultural Resources

This section describes the tribal cultural resources within the DWSP plan area and vicinity and assesses the potential impacts to these resources that could result from implementation of the proposed DWSP.

4.9.1 Setting

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.

Watsonville lies within an area traditionally occupied by the Ohlone, or Costanoan, people. Ohlone territory extends from San Pablo Bay to Point Sur, with the inland boundary most likely constituted by the interior Coast Ranges (Kroeber, 1925). The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region (Kroeber, 1925).

The pre-contact Ohlone were semi-sedentary, with a settlement system characterized by base camps of tule reed houses and specialized seasonal camps (Skowronek, 1998). Groups with higher populations occupied some sedentary villages, but used specialized seasonal camps (Levy, 1978). Villages were divided into small polities, or tribelets, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities (Skowronek, 1998; Kroeber, 1925; Levy, 1978). Social organization appeared flexible to ethnographers and any sort of social hierarchy was not apparent to mission priests (Skowronek, 1998).

Ohlone subsistence was based on hunting, gathering, and fishing (Kroeber 1925; Skowronek, 1998). Mussels provided a particularly important food resource (Kroeber, 1925). Sea mammals were also important. Sea lions and seals were hunted and beached whales were exploited (Kroeber, 1925:467). The Ohlone employed the tule balsa raft to exploit aquatic food sources. The acorn was also an important staple, as in the rest of California, and was prepared by leaching acorn meal both in openwork baskets and in holes dug into the sand (Kroeber, 1925; 1971). The Ohlone smoked tobacco and also practiced controlled burning to facilitate plant growth (Kroeber, 1925, 1971; Skowronek, 1998).

Seven Franciscan missions were built within Ohlone territory in the late 1700s, and members of the Ohlone group were eventually brought into the mission system (Kroeber, 1925; Skowronek, 1998). After the establishment of the missions, the Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 in 1814 (Skowronek, 1998). In 1973, the population of people with Ohlone descent was estimated at fewer than 300 (Levy, 1978). The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture (Skowronek, 1998).

Given this history, there is potential for remnants of ancestral culture, gathering places, or traditional properties that may be considered Tribal Cultural Resources (TCRs) in the plan area.

4.9.2 Regulatory Setting

a. Assembly Bill 52 of 2014

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).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be adopted or 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.

b. California Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government’s jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research’s Tribal Consultation Guidelines (2005): “The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places.” SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

The proposed DWSP is a specific plan. The City will consider the potential adoption of the DWSP. Therefore, SB 18 is applicable to the proposed project.

c. Consultation Results

As part of its tribal cultural resources consultation process under AB 52 and SB 18, the City of Watsonville sent letters via certified mail on October 4, 2022 to the following Native American tribes that that were identified by the NAHC as being traditionally and culturally affiliated with the geographic area:

- Amah Mutsun Tribal Band
- Amah Mutsun Tribal Band of Mission San Juan Bautista

- Costanoan Ohlone Rumsen-Mutsen Tribe
- Indian Canyon Mutsun Band of Costanoan
- Wuksache Indian Tribe/Eshom Valley Band
- Muwekma Ohlone Indian Tribe of the SF Bay Area
- Ohlone/Costanoan-Esselen Nation

Copies of the consultation letters sent to these tribes are included as Appendix F to this EIR.

Under AB 52 and SB 18, Native American tribes typically have 30 days and 90 days, respectively, to respond and request further project information and formal consultation. On November 16, 2022, the City of Watsonville received a response via email from Canyon Sayers-Roods of the Indian Canyon Mutsun Band of Costanoan requesting consultation. Because the 30-day window for a Tribe to request consultation under AB 52 ended on November 3, 2022, and the 90-day window for a tribe to request consultation under SB 18 ended Monday January 02, 2023, tribal consultation between the Tribe and the City was conducted under SB 18 nexus. The City received no responses from the other six Tribes contacted.

The City and Canyon Sayers-Roods, representing the Indian Canyon Mutsun Band of Costanoan, held a virtual consultation meeting on December 19, 2022. The City presented the goals of the DWSP, and asked the tribe what measures the City could take to lessen effects to tribal resources and tribal cultural resources. The tribe requested the following for the City's consideration:

- Public outreach and community engagement about the rich and diverse history of the tribe, currently and since pre-contact times;
- Arts initiatives with public infrastructure plans to give the vibrancy of "truth and History" that can present and showcase layered history;
- Assure Native people have access to native plant and gathering spaces, ideally during harvest times;
- Fostering community knowledge about traditional gathering areas and traditional land maintenance;
- Give City and Public Parks maintenance staff a cultural sensitivity and competency training; and
- A strong management plan for unanticipated discoveries of cultural tribal, and tribal cultural resources.

The City acknowledged the City would remain sensitive to the tribe's primary concerns. Consultation between the City and the Indian Canyon Mutsun Band of Costanoan regarding DWSP pursuant to SB 18 will be closed prior to potential adoption of the DWSP.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

In accordance with Appendix G of the State *CEQA Guidelines*, the proposed project would result in potentially significant environmental effects on tribal cultural resources if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- 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 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.

b. Project Impacts and Mitigation Measures

Threshold 1:	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)?
Threshold 2:	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?

IMPACT TCR-1 DEVELOPMENT ENVISIONED IN THE DWSP WOULD HAVE THE POTENTIAL TO ADVERSELY CHANGE TRIBAL CULTURAL RESOURCES. IMPLEMENTATION OF MITIGATION MEASURE TCR-1 WOULD REDUCE THE IMPACT TO LESS THAN SIGNIFICANT.

No specific tribal cultural resources were identified in the City of Watsonville as a result of consultation with the Tribes. Potential tribal cultural resources in the DWSP plan area are largely destroyed or obscured by over a century of development and Tribal displacement; however, remnants of these resources may be underground or otherwise obscured by buildings and structures. Tribal cultural resources could also be in small patches of undeveloped land, such as narrow strips of unpaved dirt or grass between parking lots or buildings. These resources could be revealed with demolition of existing buildings or construction of the development envisioned in the DWSP, when the ground surface and surrounding open spaces are exposed. For example, development of a new building in the plan area could require excavation for utility installation, at which time previously unknown or unidentified tribal cultural resources could be encountered.

Adherence to the requirements of AB 52 would require Tribal consultation with local California Native American Tribes prior to implementation of future project activities subject to CEQA or SB 35. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Due to the programmatic nature of the proposed DWSP it is not possible to fully determine impacts of specific projects on specific sites; however, no tribal cultural resources were identified during SB 18 consultation, and no AB 52 consultation occurred as a result of outreach as no tribes responded to offers to consult.

Nonetheless, projects associated with the proposed DWSP have the potential to significantly impact tribal cultural resources through ground disturbance. Implementation of Mitigation Measure TCR-1 is required.

Mitigation Measures

TCR-1 Suspension of Work In The Area of Potential Tribal Cultural Resources

In the event that potential tribal cultural resources, such as archaeological resources of Native American origin or tribal traditional tangible spaces or artifacts (historic-era and pre-contact era), are identified during implementation of a development project within the DWSP plan area, onsite project activities within 50 feet of the find shall be temporarily suspended or redirected until either an archaeologist has evaluated the nature and significance of the find (if archaeological) as a pre-contact or Native American-associated resource and an appropriate local Native American representative is consulted, or an appropriate local Native American representative is consulted regarding the significance of the resource (if not archaeological). If the City of Watsonville, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented for the specific development project in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource or providing Tribal cultural sensitivity training about the resource to applicable City staff if it will be managed, appropriate public outreach regarding the resource, or heritage recovery (recovering items of tribal cultural heritage according to established tribal customs).

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would protect tribal cultural resources in the event of their discovery during implementation of the proposed project, reducing the potential impact on such resources to less than significant.

c. Cumulative Impacts

Tribal cultural resources are typically site specific. However, some tribal cultural resources have the potential to extend across project sites or multiple properties; therefore, the appropriate geographic scope for cumulative tribal cultural resources impacts includes parcels adjacent to the plan area as well as in the plan area. Projects listed in Table 3-1 in Section 3, *Environmental Setting*, were considered during the analysis of cumulative impacts, even though many of these projects are not within or directly adjacent to the plan area.

The reasonably foreseeable future projects in the cumulative impact assessment area and nearby (see Table 3-1 in Section 3, *Environmental Setting*) would involve construction activities that require ground disturbance. For example, these projects could require trenching for utility connections or grading to prepare the site for pouring foundations. These types of construction activities would therefore have potential to impact both known or previously unknown tribal cultural resources. Because construction typically involves heavy machinery, such as dozers and trucks, encountering resources could cause substantial adverse changes to the resources. Accordingly, the potential cumulative impacts to tribal cultural resources would be significant.

As described under Impact TCR-1, the proposed project would result in a significant impact without mitigation to unknown tribal cultural resources. Mitigation Measure TCR-1 would reduce project-

level impacts to less than significant. Therefore, the project's contribution to cumulative impacts to tribal cultural resources would not be cumulatively considerable.

5 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the DWSP establishes the following guiding principles and objectives for Downtown Watsonville:

- Preserve key elements that make Downtown unique
- Establish a varied choice of uses and experiences for our diverse community
- Create diverse and inclusive housing opportunities
- Promote local economic prosperity
- Create a vibrant, safe, and active Downtown
- Foster a healthy, inclusive, and culturally connected community where all can thrive
- Re-imagine and innovate mobility options and connections
- Incorporate sustainable design elements to improve community health

As mentioned above, the *CEQA Guidelines* advise that an alternatives discussion in an EIR should be limited to alternatives that would avoid or substantially lessen any of the significant effects of the project and would achieve most of the project objectives. As discussed in Section 6, *Other CEQA Required Discussions*, the proposed DWSP would result in significant unavoidable impacts related to air quality, cultural resources, noise, and transportation. These impacts are primarily due to the increased density envisioned in the DWSP. As discussed in the respective sections of this EIR, with implementation of mitigation measures, the proposed project would not result in other significant and unavoidable impacts.

5.1 Selection of CEQA Alternatives

Included in this analysis are three alternatives, including the CEQA-required “no project” alternative, that involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Repurposed Walker Street Industrial Uses
- Alternative 3: Reduced Density Alternative

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 5.2 through 5.4.

5.2 Alternative 1: No Project Alternative

5.2.1 Description

Section 15126.6(e) of the *CEQA Guidelines* requires a specific alternative of “no project” be evaluated in an EIR to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. *CEQA Guidelines* section 15126.6(e)(3) describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan; and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). Alternative 1 represents the former alternative type of no project and assumes the DWSP is not adopted or implemented, and instead there is continued implementation of the City’s current General Plan for the plan area.

Under this alternative, the proposed DWSP would not be adopted or implemented. Therefore, the City’s General Plan would not need to be amended to reflect the DWSP. Thus, any new development in the plan area would occur consistent with the existing land use designations and the allowed uses within each designation in the City’s General Plan. Development under this alternative is anticipated to be less intensive and result in greater low-density development within the plan area compared with the DWSP, because the proposed DWSP envisions increased density compared to the General Plan. Specifically, under this alternative, the plan area would have approximately 64 housing units, approximately 1.6 million square feet of commercial space, and approximately 809,000 square feet of industrial space, all of which includes existing development already in the plan area.

The transportation and mobility improvements envisioned in the DWSP would also not occur under this alternative. For example, as describe in Table 2.2 in Section 2, *Project Description*, the proposed DWSP envisions uncoupling East Lake Avenue and East Beach Street as pair one-way streets in opposing directions and instead making each a two-way street. The current General Plan does not envision this mobility improvement. Therefore, this improvement and the others described in Section 2, *Project Description*, would not occur under this alternative.

5.2.2 Impact Analysis

a. Air Quality

Alternative 1 would result in less dense development downtown, and it would also generally keep or maintain existing conditions in the plan area, which is developed and urbanized. Because less development would occur compared with the DWSP, Alternative 1 would result in less construction activity in the plan area. There are no specific development projects proposed within the plan area that are consistent with the General Plan at this time; therefore, it is not possible to model construction emissions of Alternative 1. However, based on how little new development would be expected under this alternative, Alternative 1 would have construction emissions likely below applicable MBARD thresholds. This is supported by the fact that the DWSP envisions much more development in the plan area than Alternative 1, and the construction emissions of the DWSP would be below applicable MBARD thresholds (see Table 4.2-4 in Section 4.2, *Air Quality*).

Operational emissions within the plan area would also be reduced under Alternative 1 compared with the proposed DWSP because there would be less residential, commercial, and industrial development. For example, under Alternative 1, there would be 64 housing units in the plan area,

including those units that currently exist. The proposed DWSP would add approximately 3,886 housing units to the plan area. The far fewer housing units under Alternative 1 would result in a corresponding decrease in operational emissions within the plan area. However, though emissions generated within the plan area would be reduced under Alternative 1, emissions citywide or regionally could increase. The potential for this increase would be the result of less dense development downtown, meaning new development would occur farther from business centers and people would need to commute in vehicles more frequently.

Overall, Alternative 1 would result in less construction and development in the plan area compared to the DWSP. Alternative 1 would result in less than significant air quality impacts. Impacts of Alternative 1 would be reduced compared to the proposed DWSP.

b. Cultural Resources

Alternative 1 is a continuation of the City's General Plan, which applies land use designations to the plan area. Accordingly, Alternative 1 facilitates development within the plan area, only at a reduced density compared with the DWSP. Because Alternative 1 facilitates development in the plan area consistent with existing land use designations, Alternative 1 would have the potential to impact the same cultural resources as the proposed DWSP. Although Alternative 1 would provide less density in the plan area, the construction of these buildings under this alternative would still generally result in ground disturbance across the entire site given the relatively small parcel sizes in the downtown area. In other words, the increased density envisioned in the DWSP is generally from adding height to buildings rather than expanding buildings over large areas of land. Impacts would be potentially significant and unavoidable, and similar to the impacts of the DWSP on cultural resources.

c. Noise

Alternative 1 would result in less dense development downtown. Therefore, compared with the DWSP, Alternative 1 would result in less construction activity in the plan area. There are no specific development projects proposed within the plan area that are consistent with the General Plan at this time; therefore, it is not possible to model construction noise levels of Alternative 1. However, based on how little new development would be expected under this alternative, Alternative 1 would result in less construction noise when compared with the proposed DWSP.

Because no specific projects are proposed downtown consistent with the General Plan at the time of preparation of this EIR, existing noise levels are reasonably expected to continue into the future, as an operational stage of Alternative 1. As described in Existing Conditions: Noise (Rincon Consultants 2020), ambient noise levels exceed City noise standards at numerous locations with the plan area. Accordingly, similar to the proposed DWSP, noise levels would exceed City standards under Alternative 1. However, ambient noise levels are an existing condition, and Alternative 1 would not substantially change existing conditions, but instead add incremental development with negligible increases in noise levels. Therefore, Alternative 1 would result in less than significant impacts on existing noise conditions, which would be reduced compared to the noise impacts of the DWSP.

d. Transportation

Alternative 1 would result in less dense development downtown compared with the DWSP. While the current General Plan does not prohibit redevelopment of developed sites, potential redevelopment in the plan area would be generally consistent with existing conditions because existing development is generally consistent with the General Plan and this alternative assumes

consistency with the General Plan. Accordingly, implementation of Alternative 1 would generally maintain existing conditions as they related to VMT. As described in the Transportation Analysis prepared for the DWSP (Appendix E), existing VMT in the plan area exceeds significance thresholds, which are based on regional VMT. Compared with the DWSP, Alternative 1 would exceed more VMT metrics, such as VMT per residential capita, which would not be exceeded by the proposed DWSP (see Existing Conditions VMT in the Transportation Impact Analysis; Appendix E). Therefore, Alternative 1 would result in greater VMT per capita in the plan area than the proposed DWSP. Impacts for Alternative 1 would be significant and unavoidable, as they are for the DWSP.

5.2.3 Feasibility of Alternative 1

Alternative 1 is feasible to implement because it would consist of buildout of City's adopted General Plan.

5.2.4 Relationship of Alternative 1 to Project Objectives

The objectives of the proposed project center on encouraging and facilitating growth in the plan area, which consists of the downtown area of Watsonville. The City's General Plan also facilitates growth in the plan area, and therefore, Alternative 1 is consistent with this component of the project objectives. However, Alternative 1 would not satisfy specific project objectives about the types and density of growth within the plan area. For example, Alternative 1 includes only 64 housing units in the plan area, which would fail to meet the objective of creating diverse and inclusive housing opportunities. Because the DWSP would provide more density in the plan area compared with the General Plan, Alternative 1 could also fail to promote economic prosperity and a vibrant and active downtown when compared with the DWSP. Additionally, because the General Plan does not envision the mobility improvements contained in the DWSP, Alternative 1 would also not meet the project objective to re-imagine and innovate mobility options in the plan area.

5.3 Alternative 2: Repurposed Walker Street Industrial Uses

5.3.1 Description

Currently, the Walker Street corridor within the plan area is characterized by factory and light-industrial businesses that were once or originally serviced by rail. The vacant and underutilized industrial buildings in the Walker Street corridor are not in pristine condition but have the potential for adaptive reuse. The old rail depot is located at Walker Street and W. Lake Avenue, just outside the plan area boundary. In the future, the rail depot could potentially provide passenger rail access to Watsonville, making this area a new downtown gateway. For these reasons the proposed DWSP recognizes the Walker Street corridor as a good opportunity for new businesses to locate in and near downtown. Accordingly, the DWSP designates the Walker Street corridor as Downtown Industrial.

Under Alternative 2, Repurposed Walker Street Industrial Uses Alternative, the Walker Street corridor would be changed into an active transit-oriented area. The transit-oriented area would include new housing in proximity to transit and new retail, galleries, breweries, coffee roasters, and coffee shops, as well some creative offices and makerspaces. The existing industrial uses on Walker Street would be phased out over time. Specifically, over time, Alternative 2 would remove approximately 7,300 square feet of existing retail space and approximately 375,827 square feet of

industrial space. The General Plan and zoning designations for this area would be Downtown Mixed Use and Downtown Neighborhood, respectively. These designations would allow for a mix of residential and retail uses, including within the same building. Other parts of the plan area would remain as envisioned in the proposed DWSP.

5.3.2 Impact Analysis

a. Air Quality

The DWSP would designate the Walker Street corridor as Downtown Industrial, which is generally consistent with the existing land uses along Walker Street within the plan area. Under Alternative 2, the Walker Street corridor would switch to residential and commercial space, over time. Therefore, Alternative 2 could require more demolition activities than the proposed DWSP. Similarly, because Walker Street already contains industrial buildings, redevelopment with other types of buildings, such as residential buildings, could result in more construction emissions compared with the DWSP. This is because new residential buildings and mixed-use buildings would not be constructed in the Walker Street corridor under the DWSP. The additional residential units that would be constructed under this alternative would also introduce additional housing to the area and contribute to population growth inconsistent with the growth assumptions in the Air Quality Management Plan to a greater extent than the DWSP. Impacts related to conflicts with an applicable air quality management plan would be significant and unavoidable under both Alternative 2 and the DWSP.

Industrial land uses and processes typically generate air pollution. Alternative 2 would reduce the amount of space in the plan area where industrial processes could occur. However, Alternative 2 would increase the number of people residing in the plan area by replacing industrial development with residential and mixed-use development. As shown in Table 4.2-5 in Section 4.2, *Air Quality*, the most operational emissions of the DWSP result from mobile sources (i.e., vehicle trips). Locating more residents downtown with the plan area could reduce the need for vehicle travel by placing people in proximity to commercial uses. However, the reduction of industrial space could also result in reduced employment in the plan area, requiring residents to commute to jobs or employment. The additional commuter trips that could occur under Alternative 2 would have corresponding mobile-source emissions that would not occur under the DWSP. Implementation of Mitigation Measure AQ-1, described in Section 4.2, *Air Quality*, would be required for Alternative 2. With implementation of this mitigation measure, impacts related to net increases of criteria pollutants would be significant and unavoidable. This significant and unavoidable impact of Alternative 2 would be similar in severity as the DWSP.

This alternative would result in slightly less severe impacts related to odors because residential uses and mix-use development typically produce less adverse odors than industrial processes. This alternative would also result in less severe impacts related to exposure of people to pollutants for the same reason of less industrial emissions and air pollution.

b. Cultural Resources

While the DWSP provides land use designations for the entire plan area, it focuses on infill development of vacant or under-utilized sites. The DWSP designates the Walker Street corridor as Downtown Industrial, which is consistent with the existing development within the corridor. Therefore, implementation of the DWSP would result in minimal changes within the Walker Street Corridor. In contrast, Alternative 2 would redevelop the corridor with residential and mixed-use development. There are no known designated historic resources along Walker Street within the plan

area; however, several existing structures along Walker Street within the plan area are identified as potentially eligible for historic designation in the report (Rincon Consultants, 2021). Implementation of Alternative 2 could result in demolition of these structures, whereas the DWSP would be less likely to result in their demolition. Accordingly, Alternative 2 would have more severe impacts to historic resources than the proposed DWSP.

Other parts of the plan area would remain as envisioned in the proposed DWSP. There would be similar potential to impact unknown buried archaeological resources within the plan area or to impact other historic properties regardless of the potential implementation of Alternative 2 or the DWSP. This is because development under Alternative 2 would occur in the plan area, and the relatively small size of parcels in the downtown setting of the plan area typically require disturbance of the entire site or nearly the entire site regardless of the building type proposed on the site. Implementation of all mitigation measures pertaining to cultural resources for the DWSP would also be required for Alternative 2. However, even with implementation of mitigation, impacts would remain significant and unavoidable. Impacts of Alternative 2 would be more severe compared to the DWSP due to the potential to impact potentially eligible structures on Walker Street.

c. Noise

Under Alternative 2, the plan area would remain as envisioned in the proposed DWSP with the exception of the Walker Street corridor. Therefore, the noise impacts of the DWSP and Alternative 2 would be comparable across most of the plan area. However, Alternative 2 could result in more short-term construction noise and vibration because more demolition and subsequent construction activity would occur along Walker Street than under the DWSP. Implementation of mitigation measures required for the DWSP, including NOI-1(a), NOI-1(b), and NOI-2, would be required for Alternative 2. Similar to the DWSP, even with mitigation measures implemented, impacts of construction noise and vibration would remain significant and unavoidable, with the impact being slightly more severe under Alternative 2.

Implementation of Alternative 2 would reduce industrial process noise within the plan area, specifically within and near the Walker Street corridor. With less industrial development in the area, there could also be a decrease in truck trips, which tend to be louder than passenger vehicles, such as sedans and sports-utility vehicles. However, the reduction of industrial space within the plan area could result in more commuter vehicle trips within the plan area, as plan area residents commute to industrial employment elsewhere, outside of the plan area. Accordingly, operational noise and vibration impacts of Alternative 2 would be significant and unavoidable and similar to the proposed DWSP.

d. Transportation

Under Alternative 2, the plan area would remain as envisioned in the proposed DWSP apart from the Walker Street corridor. Redevelopment of the Walker Street corridor with residential and mixed-use development would increase the number of people residing within the plan area. Therefore, compared with the DWSP, Alternative 2 would have the potential to further reduce VMT per capita. This is because Alternative 2 would add more residential units to the plan area, thereby increasing the number of people that VMT is distributed amongst.

However, the reduction of industrial space within the plan area could result in more commuter vehicle trips within the plan area, as plan area residents commute to industrial employment elsewhere, outside of the plan area. It is unknown where these residents would commute for industrial employment, and thus the VMT of these commuter trips cannot be calculated without

speculation. However, the DWSP would exceed the threshold of VMT per industrial employee. Therefore, it can be reasonable assumed that with even less industrial employment and added commute trips, VMT per industrial employee would increase under Alternative 2 compared with the proposed DWSP because there would be fewer employees to distribute VMT amongst. Impacts of Alternative 2 related to VMT per industrial employee would be significant and unavoidable and greater or more severe than the DWSP.

Overall, transportation impacts of Alternative 2 would be similar to the DWSP, with some impacts being slightly greater (VMT per employee) and others slightly reduced (VMT per capita).

5.3.3 Feasibility of Alternative 2

Alternative 2 is feasible to implement because it would consist of the DWSP with modifications to the type of land uses along Walker Street within the plan area.

5.3.4 Relationship of Alternative 2 to Project Objectives

The objectives of the proposed project center on encouraging and facilitating growth in the plan area, which consists of the downtown area of Watsonville. Alternative 2 would also facilitate growth in the plan area, and therefore, Alternative 2 is consistent with this component of the project objectives. Alternative 2 could fulfill select objectives to a greater extent than the DWSP, such as establishing a varied choice of uses and experiences downtown and creating diverse and inclusive housing opportunities. Alternative 2 could better fulfill these objectives because it would facilitate more housing and mixed-use development within the plan area compared with the DWSP. However, Alternative 2 would fail to satisfy select objectives as well as the DWSP. For example, Alternative 2 could be less successful at promoting local economic prosperity, because it would remove much of the industrial development and employment from the plan area.

5.4 Alternative 3: Reduced Density Alternative

5.4.1 Description

Alternative 3 would reduce the residential and non-residential development density facilitated by the proposed DWSP such that approximately 25 percent fewer new residential dwelling units and 25 percent less office, commercial, dining, and industrial development square footage would be created. Development would occur within the same areas where development would occur under the proposed DWSP, only at a reduced density. Generally, this would be achieved by reducing the height of new residential buildings by a story and the overall size of other types of new buildings in the plan area compared with the heights or FAR proposed or envisioned in the DWSP.

This alternative is similar to Alternative 1 in that overall density would be less compared to the proposed DWSP; however, unlike Alternative 1, Alternative 3 would require amendments to the existing General Plan and would increase density in the plan area compared to the continued implementation of the existing General Plan. Table 5-1 provides a comparison of the development that would occur within the plan area under Alternative 3 and the proposed DWSP.

Table 5-1 Alternative 3 and DWSP Density Comparison

Plan Scenario	Land Use Type			
	Residential (du)	Commercial (sf)	Industrial (sf)	Civic (sf)
Alternative 3	2,915	173,363	282,620	85,929
Proposed DWSP	3,886	231,151	376,827	114,572

Note: 'du' equals dwelling unit and 'sf' equals square feet, and values presented in table are approximate
Source: City of Watsonville 2022

5.4.2 Impact Analysis

a. Air Quality

As detailed in Section 4.7, *Population and Housing*, the current population of Watsonville is 50,669 and the average household size is approximately 3.52 persons per household. Alternative 3 would add an estimated 2,915 additional residential units, which would increase the City's population by 10,261 to approximately 60,930. According to the Association of Monterey Bay Area Governments (AMBAG) population forecast, the City's population would be 56,344 in 2045. Therefore, the estimated population of 60,930 with buildout of Alternative 3 would exceed AMBAG's population forecasts for 2045 by approximately 4,586 people. This would be an improvement compared to the DWSP which would exceed forecasts by approximately 8,004 people (see Table 4.7-2 in Section 4.7, *Population and Housing*). However, because the anticipated increase in population would be inconsistent with long-term growth projections for the county, implementation of Alternative 3 would conflict with an air quality plan, and therefore Alternative 3 would result in a potentially significant impact. Implementation of Mitigation Measure AQ-1 would be required, similar to the proposed project. However, with implementation of mitigation, impacts related to conflict with an air quality plan would remain significant and unavoidable, as population growth would continue to exceed projections. Compared with the DWSP, the severity of this impact would be reduced under Alternative 3, because the DWSP exceeds population growth forecasts to a greater extent than Alternative 3.

Alternative 3 would result in approximately 25 percent less development in the plan area compared with the DWSP. Accordingly, construction activities and associated air pollutant emissions would also decrease under Alternative 3. Construction emissions of the DWSP would be below MBARD significance thresholds. Because Alternative 3 would result in less construction emissions than the DWSP, construction emissions of Alternative 3 would also be below MBARD significance thresholds. Alternative 3 would also reduce the potential to expose sensitive receptors to construction dust. Overall, air quality impacts resulting from construction activities under Alternative 3 would be less than significant, and construction emissions impacts would be reduced or less severe when compared to the DWSP.

Operational emissions within the plan area would also be reduced under Alternative 3 compared with the proposed DWSP because there would be less residential, commercial, and industrial development. For example, as shown in Table 5-1, there would be 2,915 housing units in the plan area, which is less than the 3,886 envisioned by the DWSP. The reduced density under Alternative 3 would result in a corresponding decrease in operational emissions within the plan area. Though Alternative 3 would reduce emissions generated within the plan area, emissions remain above MBARD thresholds. As shown in Table 4.2-5 in Section 4.2, *Air Quality*, some operational emissions of the DWSP, such as ROG emissions, would exceed MBARD thresholds by substantially more than

25 percent. Therefore, assuming a 25 percent reduction in emissions resulting from a 25 percent reduction in development density, operational emissions could still exceed MBARD significant thresholds. Implementation of Mitigation Measure AQ-1 would be required under Alternative 3, similar to the proposed DWSP. However, impacts of Alternative 3 related to operational emissions of criteria pollutants would remain significant and unavoidable.

Alternative 3 would locate people in proximity to potential toxic air contaminants, as well as during construction of development that could occur under Alternative 3. Implementation of Mitigation Measures AQ-3(a) and AQ-3(b) would be required. However, with implementation of these mitigation measures, impacts of Alternative 3 related to exposure of sensitive receptors to substantial pollutant concentrations would remain significant and unavoidable. Impacts would be slightly reduced or less severe compared with the DWSP, because Alternative 3 would result in less residential development and therefore fewer receptors to toxic air contaminants.

b. Cultural Resources

Alternative 3 would facilitate development within the same plan area as the DWSP. While density would be reduced under this alternative compared with the DWSP, the reduction would generally occur from removing a story of residential buildings. The footprint (or foundation) of commercial and industrial buildings could be reduced under this alternative, since these types of buildings are often a single story. However, the construction of these buildings would still generally result in ground disturbance across the entire site given the relatively small parcel sizes in the downtown area. Therefore, implementation of Alternative 3 would have the potential to encounter previously unknown or undiscovered buried cultural resources during construction. Implementation of mitigation measures pertaining to cultural resources in the Initial Study (Appendix A) would be required. With implementation of these mitigation measures, impacts to buried and undiscovered cultural resources would be less than significant and similar to the proposed DWSP.

Alternative 3 could result in the demolition or redevelopment of the same structures as the DWSP. Therefore, Alternative 3 could impact the same historic buildings or buildings recommended as eligible for historic designation as the DWSP. Implementation of mitigation required for the DWSP, including Mitigation Measures CUL-1(a) and CUL-1(b), would be required for Alternative 3. With implementation of mitigation, impacts would remain significant and unavoidable. Compared with the DWSP, impacts would be slightly reduced or less severe. The reduced severity would be due to the reduced height of new residential buildings under Alternative 3. The reduced size of these new buildings would be slightly more consistent with the height of historic buildings in the plan area.

c. Noise

Alternative 3 would result in approximately 25 percent less development in the plan area compared with the DWSP. Accordingly, construction activities and associated noise and vibration generated from construction would also decrease under Alternative 3. However, like the DWSP, Alternative 3 would include construction in proximity to sensitive receptors, such as existing schools or residences. Implementation of mitigation measures required for the DWSP, including NOI-1(a), NOI-1(b), and NOI-2, would be required for Alternative 3. Similar to DWSP, even with mitigation measures implemented, impacts of construction noise and vibration would remain significant and unavoidable, with the impact being slightly less severe under Alternative 3 due to less construction.

Implementation of Alternative 3 would reduce density. However, the reduced density would not have substantial ramifications on operational noise levels. This is because the operational activities that generate noise would persist, such as HVAC units or vehicle travel. Accordingly, operational

noise and vibration impacts of Alternative 2 would be significant and unavoidable and similar to the proposed DWSP.

d. Transportation

Alternative 3 would result in approximately 25 percent less development in the plan area compared with the DWSP. This reduced density would generally not affect circulation patterns envisioned by the DWSP. Therefore, impacts related to conflicts with a program, plan, ordinance or policy addressing the circulation system would be less than significant under Alternative 3 and similar to the DWSP. The impacts of Alternative 3 related to transportation hazards would be less than significant, and slightly less severe compared with the DWSP. Impacts related to safety hazards would be slightly less severe because Alternative 3 would result in less truck trips within the plan area due to reduced commercial and industrial development density. Generally, large trucks can create safety hazards or conflicts with traditional vehicles, such as sedans, as well as pedestrian and cyclists.

Compared with the DWSP, Alternative 3 would not change the types of development envisioned in the DWSP. Therefore, the VMT generated by these land uses types would be approximately the same under both Alternative 3 and the DWSP. However, Alternative 3 would reduce the population and employment, or number of jobs, within the plan area compared with the DWSP. Because there would be fewer people and jobs, total VMT would be distributed among fewer people and jobs. Accordingly, the VMT per capita and VMT per job would increase under Alternative 3. The VMT per capita could exceed significant thresholds (see Section 4.8, *Transportation*), and VMT per employee would exceed significant thresholds. Therefore, Alternative 3 would have significant and unavoidable impacts related to VMT and *CEQA Guidelines* section 15064.3. Compared with the DWSP, the VMT impacts of Alternative 3 would be greater or more severe. Overall, transportation impacts of Alternative 3 would be more severe compared with the DWSP, with safety hazard impacts slightly reduced but VMT impacts greater.

5.4.3 Feasibility of Alternative 3

Alternative 3 is feasible to implement because it would consist of the DWSP with modifications to reduce development density.

5.4.4 Relationship of Alternative 3 to Project Objectives

The objectives of the proposed project center on encouraging and facilitating growth in the plan area, which consists of the downtown area of Watsonville. Alternative 3 would also facilitate growth in the plan area, but development would occur at reduced density. Therefore, compared with the DWSP, Alternative 3 would fulfill several objectives to a lesser extent. For example, Alternative 3 would not fulfill to the same or better level objectives related to creating inclusive housing opportunities, promoting local economic prosperity, or innovate mobility options and connections. Alternative 3 would not fulfill the objective to innovate mobility options and connections as well as the DWSP because it would place fewer residents downtown where many goods and services are easily reached by active transportation modes, such as walking and cycling.

5.5 Alternatives Considered but Rejected

Location Alternative

Given that the main purpose of the DWSP is to provide a comprehensive land use and mobility plan, along with development and design regulations, to guide future public and private development in the downtown area of Watsonville, it would not be feasible to evaluate an alternative location (i.e., another city or location in Watsonville). The DWSP must, by its nature, guide future development located in the plan area, which is downtown Watsonville. *CEQA Guidelines* section 15126.6(a) allows for consideration of alternatives to a project, or its *location* (emphasis added), but does not mandate inclusion of a location alternative in an EIR. Accordingly, to evaluate another location for downtown development would not be meaningful for the purposes of informing a decision about the proposed DWSP, and a Location Alternative is not discussed further.

5.6 Environmentally Superior Alternative

The *CEQA Guidelines* specify that an EIR must identify the environmentally superior alternative among those discussed. If the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Alternative 1, No Project Alternative, would result in either similar levels or reduced severity of the potentially significant and unavoidable impacts of the DWSP. For example, overall, Alternative 1 would reduce potentially significant impacts related to air quality and noise. Similar impacts would result to cultural resources and transportation.

Alternative 2 would potentially fulfill project objectives even better than the DWSP. However, implementation Alternative 2 would slightly reduce impacts only to air quality compared with the DWSP. Other impacts would either be similar to, or increased severity compared with the DWSP. Because these impacts would remain similar or potentially become more severe, Alternative 2 is not the environmentally superior alternative.

Alternative 3 would reduce or slightly reduce impacts to air quality, cultural resources, and noise, compared to the DWSP. However, compared with the DWSP, Alternative 3 would result in a slightly more severe impact related to transportation. Alternative 3 be the most effective alternative to reduce the potentially significant impacts of the DWSP. For this reason, Alternative 3 is identified as the environmentally superior alternative among the other alternatives. Alternative 3 would be feasible to implement. However, as discussed above in Section 5.4.4, compared with the DWSP, Alternative 3 would fulfill several objectives to a lesser extent. For example, Alternative would not fulfill to the same or better level objectives related to creating inclusive housing opportunities, promoting local economic prosperity, or innovate mobility options and connections.

In summary, Alternative 3 is identified as the superior alternative among the other alternatives considered.

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6 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would result from the proposed DWSP. This section also summarizes the significant and unavoidable impacts of the DWSP.

6.1 Growth Inducement

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

6.1.1 Population Growth

This EIR identifies a maximum buildout for the DWSP, which is a conservative assumption developed for this analysis and is not meant to be a predictor of future growth. Overall, maximum growth would be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. The following estimate of population growth is a conservative estimate based on the maximum buildout scenario. As discussed in EIR Section 2, *Project Description*, and Section 4.7, *Population and Housing*, maximum buildout of the DWSP could accommodate an estimated 3,886 additional housing units and approximately 722,547 square feet of commercial, industrial, and civic uses over the 25-year planning horizon and beyond. The 3,886 residential units envisioned by the project would support an estimated 13,679 residents in the downtown area and would directly induce growth in the city.

As discussed within Section 4.7, *Population and Housing*, the project would facilitate an increase of 13,679 people and 3,886 units by 2045, 8,004 people and 2,022 housing units greater than what was forecasted by AMBAG. Although the project would exceed existing population and housing forecasts, the project itself anticipates and plans for this growth in downtown Watsonville. Several chapters of the DWSP provide guidance for development and growth within the downtown area, including Chapter 4, *Mobility and Transportation*; Chapter 5, *Public Realm Improvements*; Chapter 6, *Land Use and Zoning*; and Chapter 8, *Infrastructure*. These chapters establish guiding policies and goals for orderly development, and aim to ensure that growth does not outpace the capacity of existing infrastructure, services, and facilities. Chapter 4, *Mobility and Transportation*, outlines the vision and framework for improving and growing the pedestrian, bicycle, vehicle, and transit network in Watsonville, and Chapter 5, *Public Realm Improvements*, describes recommended improvements in the downtown area to enhance the pedestrian experience and link various areas of downtown Watsonville together.

Chapter 6, *Land Use and Zoning*, would directly facilitate orderly development in downtown Watsonville by establishing standards and guidelines to regulate future development on privately-owned properties. Changes to existing land use and zoning designations are intended to deliver the physical outcomes envisioned for downtown Watsonville and would concentrate urban activity and

intensity in the center of downtown while transitioning to lower-intensity uses at the edge of downtown. Finally, Chapter 8, Infrastructure, outlines recommended upgrades and improvements for the existing water, sewer, and stormwater systems in Watsonville to serve anticipated growth and development.

6.1.2 Removal of Obstacles to Growth

The land use plan and policies in the DWSP prioritize infill development, reuse of limited underutilized parcels, reimagined mobility options, mixed-use design, and preserve key elements that make downtown Watsonville unique while supporting growth in areas already well-served by existing public facilities and services. New development would occur where existing roads, water, and sewer and other utilities are in place and in a manner that minimizes the impact of development on existing infrastructure and services. Despite the proposed change in land use designations, the project would generally preserve the existing pattern of land uses in the City, particularly within the downtown area.

6.2 Irreversible Environmental Effects

An EIR must identify any significant irreversible environmental changes that would be caused by the proposed project being analyzed. Irreversible environmental changes may include current or future commitments to the use of non-renewable resources, or secondary or growth-inducing impacts that commit future generations to similar uses. In addition, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. The *CEQA Guidelines* describe three categories of significant irreversible changes that should be considered, as further detailed below.

6.2.1 Land Use Changes Which Would Commit Future Generations

As described throughout this EIR, the DWSP is long-range plan that focuses on revitalizing the traditional downtown center of Watsonville by allowing higher density infill development in areas with unbuilt and underutilized parcels of land and replacement of underutilized uses. Growth and development envisioned in the DWSP would occur as infill development of similar types as existing uses, though at occasionally higher densities than at present. Such growth and revitalization would not commit future generations to changes in land use which would be substantial.

6.2.2 Irreversible Changes from Environmental Actions

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development envisioned in the DWSP. However, compliance with hazardous materials regulations and policies, and the remediation of existing conditions within the project site, as outlined in the Initial Study (Appendix A) and Section 4.5, Hazards and Hazardous Materials, would reduce this potential impact to less than significant.

Other than the accidental release of hazardous materials, the development and land uses occurring in the plan area with implementation of the DWSP would be similar to those urban activities occurring in any metropolitan area.

6.2.3 Consumption of Nonrenewable Resources

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands to urban uses, and lost access to mineral reserves. The DWSP envisions development within primarily vacant or underutilized parcels in the downtown area of Watsonville. No agricultural lands would be converted and no access to mining reserves would be lost with implementation of DWSP because these resources do not exist in the plan area. While development envisioned in the DWSP would require additional energy of several types for construction and for on-going use, it would not require the construction of major new lines or infrastructure to deliver energy. Furthermore, to the extent that growth throughout Watsonville and southern Santa Cruz County is partly an expression of regional demand, development within the downtown area of Watsonville would represent a more efficient allocation of non-renewable resources than many other types or patterns of growth. For example, placing residential units downtown would locate people in proximity to other land uses, such as employment or shopping/retail. This proximity would allow people to walk or bicycle to these uses, as opposed to more rural or suburban development outside of the plan area, which would typically require a personal vehicle and consume fuel.

6.3 Significant and Unavoidable Impacts

As discussed in Section 4, *Environmental Impact Analysis*, of this EIR, implementation of the DWSP would result in the following significant unavoidable adverse impacts:

- **Impact AQ-1:** The proposed project would introduce additional housing to the area and contribute to population growth that conflicts with the growth assumptions in the Air Quality Management Plan. Impacts would be significant and unavoidable.
- **Impact AQ-2:** Construction and operation of development envisioned by the DWSP would result in the temporary and long-term generation of air pollutants, which would affect local air quality and exceed MBARD thresholds. Therefore, this impact is significant and unavoidable.
- **Impact AQ-C1:** The DWSP would have a cumulatively considerable contribution to a significant cumulative impact related to emissions of air pollution and conflicts with an applicable air quality management plan.
- **Impact CUL-1:** Development envisioned in the DWSP could adversely affect known and previously unidentified historical resources. Impacts to historical resources would be significant and unavoidable.
- **Impact CUL-C1:** The DWSP would have a cumulatively considerable contribution to a significant cumulative impact on historic-era cultural resources.
- **Impact NOI-1:** Construction of development envisioned by the DWSP would temporarily increase noise levels at nearby noise-sensitive receptors. Operation of development envisioned by the DWSP would introduce new on-site noise sources and contribute to increases in traffic noise. Construction and on-site operational noise could exceed standards. This impact would be significant and unavoidable even with mitigation.
- **Impact NOI-2:** Construction of development envisioned by the DWSP would temporarily generate groundborne vibration. If required for construction, pile driving or use of a vibratory roller could potentially exceed FTA vibration thresholds and impact people or buildings. This impact would be significant and unavoidable even with mitigation.
- **Impact NOI-C1:** The construction activities for the development envisioned in the DWSP would have a cumulatively considerable contribution toward a significant cumulative impact on noise.

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- **Impact TRA-2:** Development envisioned in the DWSP would conflict with or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b). Impacts would be significant and unavoidable.
- **Impact TRA-C1:** The DWSP would have a cumulatively considerable contribution to a significant cumulative VMT impact related to a conflict or inconsistency with *CEQA Guidelines* section 15064.3, subdivision (b).

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Appendix A

Initial Study, Notice of Preparation, and Notice of Preparation Comments

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<https://www.cityofwatsonville.org/DocumentCenter/View/21328/Appendix-A---IS-NOP-Comments>

Appendix B

California Emissions Estimator Model Data

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Appendix C

Special-Status Species Potential Assessment

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Appendix D

Historic Resources Report

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Appendix E

Transportation Impact Analysis

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Appendix F

Native American Tribal Consultation Documentation

Download Appendix F:

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