



Downtown Watsonville Specific Plan

Final Environmental Impact Report
State Clearinghouse No. 2022100602

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

August 2023

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1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (Final EIR) has been prepared by the City of Watsonville, Community Development Department (City) to evaluate the potential environmental impacts of the proposed Downtown Watsonville Specific Plan (“proposed project” or “DWSP”).

As prescribed by the California Environmental Quality Act (CEQA) Guidelines Sections 15088 and 15132, the lead agency, the City, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA Guidelines Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final EIR also includes amendments to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR, which also includes a list of all commenters and public comment letters received
- Section 3: Errata to the Draft EIR
- Appendix 1: Comment Letters

1.2 Environmental Review Process

Pursuant to CEQA, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City of Watsonville distributed a Notice of Preparation (NOP) of the Draft 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 for the NOP 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 NOP was provided to public agencies, the State Clearinghouse, organizations, and individuals considered likely to be interested in the proposed project and its potential impacts. The NOP and Initial Study were also posted on the City’s website, and the NOP was published in the local newspaper (The Pajaronian). Comments received by the City of Watsonville on the NOP and Initial Study are provided in Appendix A of the Draft EIR and are summarized in Table 1-1 of the Draft EIR. These comments were considered during the preparation of the Draft EIR. The City also held a public scoping meeting on November 30, 2022, to hear and collect public input on the contents of the Draft EIR, especially as it relates to impacts and potential mitigation measures or alternatives to reduce impacts. No formal comments on the EIR were submitted during the scoping meeting.

The Draft EIR was made available for public review on May 12, 2023 through June 26, 2023, meeting the minimum 45-day period required by CEQA. Copies of the Notice of Availability of the Draft EIR were mailed to a list of interested parties, groups and public agencies, as well as property owners and occupants of neighboring and nearby properties with potential interest in the project. The Draft EIR and an announcement of its availability were posted electronically on the City's website, and a paper copy was available for public review at City Hall. The Notice of Availability of the Draft EIR was also posted at the office of the Santa Cruz County Clerk, and the Draft EIR was available for public review at the Watsonville Public Library. Additionally, the Notice of Availability, the Notice of Completion, and the Draft EIR itself were posted on the State Clearinghouse website.

The City of Watsonville received four comment letters on the Draft EIR. Copies of written comments on the Draft EIR received during the comment period are included as Appendix 1 to this Final EIR. The responses to those comments are included in Section 2 of this Final EIR.

1.3 EIR Certification Process and Project Approval

Before approving a proposed project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

Upon certification of an EIR, the lead agency may proceed to make a decision on the project analyzed in the EIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible 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). Per PRC Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

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 and explains why the project's benefits outweigh the significant environmental effects (State CEQA Guidelines Section 15093).

When an 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 (State CEQA Guidelines Section 15091[d]).

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

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2 Responses to Comments on the Draft EIR

This section presents a list of comment letters received during the public review period, a summary of those comments, and responses to those comments. The comment letters are provided as Appendix 1 to this Final EIR.

2.1 Organization of Comment Letters and Responses

The four letters are presented in the following order: State agencies (2) and individuals (2). No federal agencies and no local agencies or organizations provided written comments on the Draft EIR. Each comment letter has been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue. For example, Response 1.1 indicates that the response is for the first issue raised in comment Letter 1.

2.2 Comments Received

The following letters were submitted to the City during the public review period:

Letter No. and Commenter	Date.
State Agencies	
1 Erin Chappell, Regional Manager Bay Delta Region, California Department of Fish and Wildlife	June 15, 2023
2 Chris Bjornstad, Associate Transportation Planner, California Department of Transportation	June 26, 2023
Individuals	
3 Marven E. Norman	June 26, 2023
4 Steve Trujillo	May 31, 2023

Written responses to each comment letter received on the Draft EIR are provided in this section. All letters received during the public review period on the Draft EIR are provided in their entirety in Appendix 1 to this Final EIR.

Rewrites to the Draft EIR necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the Draft EIR, are included in the responses. Underline (underlined) text represents language that has been added to the Draft EIR; text with strikeout (~~strikeout~~) has been deleted from the Draft EIR. All rewrites are then compiled in the order in which they would appear in the Draft EIR (by page number) in Section 3, *Errata to the Draft EIR*, of this document. Page numbers cited in this section correspond to the page numbers of the Draft EIR. When mitigation measure language has been changed, it has been changed in both the text on the stated Draft EIR page and the summary table (Table 1) in the Executive Summary of the Draft EIR.

2.3 Comments and Responses

The comment letters referenced in this section are provided in Appendix 1 to this Final EIR

Letter 1

COMMENTER: Erin Chappell, Regional Manager Bay Delta Region, California Department of Fish and Wildlife

DATE: June 15, 2023

Response 1.1

The commenter states that the California Department of Fish and Wildlife (CDFW) has reviewed the Draft EIR and is providing comments.

This comment is noted and does not require revisions to the Draft EIR. Responses to individual comments submitted by CDFW are provided below in Response 1.2 through Response 1.10.

Response 1.2

The commenter summarizes CDFW's role as trustee agency and responsible agency under CEQA.

The commenter's summary of trustee and responsible agencies in the context of CEQA is accurate. This comment does not pertain to the environmental analysis or contents of the Draft EIR. This comment is noted and does not require revisions to the Draft EIR.

Response 1.3

The commenter summarizes regulatory requirements that apply to the project including the California Endangered Species Act (CESA) or Native Plant Protection Act (NPPA) Incidental Take Permit (ITP), Lake and Streambed Alteration (LSA) Notification, raptor and nesting bird protections, and fully protected species.

The proposed project is a Specific Plan that establishes a vision for the downtown area of Watsonville and does not propose construction or other activities that would require the types of regulatory permits described by the commenter. The City concurs that individual projects envisioned in the Specific Plan, when proposed for construction in the future, could require one or more of the regulatory permits described by the commenter, depending on characteristics of the specific project. Future project applicants would be responsible for obtaining all regulatory permits and approvals, including permits and approvals from CDFW at that time. Regardless, this comment does not pertain to the environmental analysis or contents of the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 1.4

The commenter states their understanding of the proposed project in the form of a summary.

The commenter's understanding of the proposed project is an accurate summary of the project as proposed and evaluated in the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 1.5

The commenter states CDFW offers comments and recommendations to assist the City in adequately identifying and/or mitigating project impacts.

This comment is a general introduction to a list of detailed comments provided later in the comment letter, which are addressed in Response 1.6 through Response 1.10 below. This comment does not require revisions to the Draft EIR.

Response 1.6

The commenter states that Santa Cruz tarplant may be impacted by the project, but the proposed mitigation measures do not reference obtaining an Incidental Take Permit if there is the potential for take of Santa Cruz tarplant. The commenter provides two recommended mitigation measures for Santa Cruz tarplant, including a focused pre-construction survey and avoidance and minimization measures.

Obtaining permits is a regulatory requirement. Because permits are regulatory, project applicants must obtain the proper permits to be compliant with federal, state, and local laws. Accordingly, mitigation need not include regulatory requirements, because adherence to regulatory requirements is mandated by law regardless of whether they are required by CEQA mitigation measures. Mitigation Measure BIO-1 as provided in the Draft EIR includes pre-construction surveys for Santa Cruz tarplant. Nonetheless, to provide clarification and more closely match guidance from CDFW, in response to this comment, pages 4.3-7 and 4.3-8 of the Draft EIR are revised as follows:

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. an experienced botanist, familiar with the native plant communities of Santa Cruz County, shall conduct a focused Santa Cruz tarplant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire project area where potential Santa Cruz tarplant habitat has been identified, prior to the initiation of construction and the results shall be included in the project environmental document. Surveys shall be conducted according to CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities.~~

If Santa Cruz tarplant is detected or likely to occur within the project area, additional measures may be needed to avoid, minimize, and/or mitigate potential project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the project proponent shall obtain an ITP pursuant to Fish and Game Code section 2081, subdivision (b) (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9). 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.

The revisions to the Draft EIR, noted above with underline and strikethrough text, do not change the substance or action of the mitigation measures provided in the Draft EIR. Instead, the revisions merely provide clarification consistent with CDFW language. Accordingly, recirculation of the Draft

EIR is not required in response to this comment, including revisions to the Draft EIR made in response to this comment. No additional revisions to the Draft EIR are necessary in response to this comment.

Response 1.7

The commenter states that Mitigation Measure BIO-2 does not indicate that baseline data would be collected if active nests are discovered or provide the qualified biologist with stop work authorization. The commenter provides two recommended mitigation measures for nesting birds, including a nesting bird survey and active nest protections. Mitigation Measure BIO-2 as provided in the Draft EIR requires pre-construction nesting bird surveys during the nesting season and protection of active nests. Nonetheless, to provide clarification and more closely match guidance from CDFW, in response to this comment, Mitigation Measure BIO-2 on page 4.3-8 of the Draft EIR is revised as follows:

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. If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos.~~ Surveys shall be conducted at the appropriate times of day and during appropriate nesting times. 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 the qualified biologist documents active nests within the project area or in nearby surrounding areas, a species appropriate buffer between the nest and active construction shall be established by the biologist. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of the nest to characterize "normal" bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active. 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.~~

The revisions to the Draft EIR, noted above with underline and strikethrough text, do not change the substance or action of the mitigation measures provided in the Draft EIR. Instead, the revisions merely provide clarification consistent with CDFW's recommended language. Accordingly, recirculation of the Draft EIR is not required in response to this comment, including revisions to the Draft EIR made in response to this comment. No additional revisions to the Draft EIR are necessary in response to this comment.

Response 1.8

The commenter states that CEQA requires any special-status species and natural communities detected during environmental review to be incorporated into the California Natural Diversity Database (CNDDDB) and provides a link to resources.

The proposed project is a Specific Plan that establishes a vision for the entire downtown area of Watsonville. Given the large size of the project site combined with the fact the Specific Plan is generalized and does not propose specific buildings or construction, no biological field surveys were required in preparation of the Draft EIR. The City concurs that individual projects envisioned in the Specific Plan, when proposed for construction in the future, could require field surveys to verify if special-status species and natural communities are present on that specific project site. If special-status species or natural communities are detected during these future surveys, the data will be provided to the CNDDDB. Regardless, this comment is generalized and does not pertain to the adequacy of environmental analysis or contents of the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 1.9

The commenter states that CDFW anticipates that the project will have impacts on fish and/or wildlife and thus will require filing fees.

The City concurs with the commenter and intends to pay the CDFW CEQA filing fee for an EIR when and if the City Council certifies the EIR and adopts the Specific Plan. This comment does not pertain to the environmental analysis or contents of the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 1.10

The commenter states appreciation for the opportunity to comment on the Draft EIR and provides follow-up contact information for future coordination with CDFW.

This comment is noted and does not require revisions to the Draft EIR.

Letter 2

COMMENTER: Chris Bjornstad, Associate Transportation Planner, California Department of Transportation

DATE: June 26, 2023

Response 2.1

The commenter states that the California Department of Transportation (Caltrans), District 5, Developmental Review, has reviewed the Draft EIR and provides their understanding of the proposed project in the form of a summary.

The commenter's understanding of the proposed project is an accurate summary of the project as proposed and evaluated in the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 2.2

The commenter states that Caltrans looks forward to coordinating with the City on the feasibility of future transportation concepts and additional traffic studies for any operational changes on the state highway system.

The City is pleased to work with Caltrans on future transportation concepts in Watsonville. This comment does not pertain to the environmental analysis or contents of the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 2.3

The commenter states that the current performance metric used by the state to evaluate operational changes to the State Highway System is Daily Vehicle Hours of Delay (DVHD). The proposed road diet within downtown would increase the amount of DVHD and Caltrans would need to know what the DVHD would be from a corridor wide approach in future studies.

Consistent with Senate Bill 743 and the State CEQA Guidelines (Section 15064.3), the City of Watsonville evaluates transportation impacts using Vehicle Miles Traveled (VMT) as the metric for determining significance. As described on pages 4.8-14 through pages 4.8-16 of the Draft EIR, the proposed DWSP would generate VMT. The VMT generated by the DWSP would reduce existing regional VMT, including VMT per capita and VMT per employee. As shown in Table 4.8-2 on page 4.8-15 of the Draft EIR, implementation of the DWSP would reduce existing VMT per capita from 9.4 to 7.9 and existing VMT per office employee from 9.6 to 9.0. Existing VMT per industrial employee would be reduced from 14.2 to 13.5. The reduction to VMT per capita, a measurement of the VMT of residential land uses, would not exceed significance thresholds, nor would VMT from retail land uses. However, as shown in Table 4.8-2, the estimated reduction in VMT per employee for office and industrial development would not be below the City's threshold of significance. Although implementation of Mitigation Measure TRA-1 should help reduce the number of vehicle trips and VMT, the EIR determined that the DWSP would have a significant and unavoidable transportation-related impact.

Although VMT is used for assessing the significance of transportation impacts from land use projects under CEQA, the City understands that Caltrans still relies on operational data (i.e., DVHD) to ensure the State Highway System functions properly. The DWSP does not provide specific design standards for the road diet within downtown, rather it provides a more conceptual vision of a road diet.

Additional studies outside the scope and context of CEQA will be performed as the road diet is designed and engineered, at which time DVHD could be more accurately determined. This type of design-level data will be coordinated with Caltrans at that time. Additionally, the City prepared a Transportation Impact Analysis for the DWSP, which is included as Appendix E to the Draft EIR. The Transportation Impact Analysis does provide operational (delay) data along the state highway system. This includes all the study intersections listed in the Transportation Impact Analysis except for the intersection of Freedom Boulevard and Brennan Street. The Transportation Impact Analysis further includes a V/C analysis with and without a roundabout at the intersection of Freedom Boulevard and Main Street. Along with the queuing analysis and recommended turning movement restrictions at Main Street and Ford Street, the intersection of Freedom Boulevard and Main Street would improve substantially with a roundabout, as described in the Transportation Impact Analysis.

This comment does not pertain to the adequacy of the VMT analysis or contents of the Draft EIR. Operational data will be considered and coordinated with Caltrans at the time of road diet design. Therefore, this comment does not require revisions to the Draft EIR.

Response 2.4

The commenter requests that the City provide a resolution or letter of support when complete street changes are proposed along the state highway system to reaffirm the concepts are still supported.

This comment does not pertain to the contents of the Draft EIR or CEQA. Accordingly, no revisions to the Draft EIR are required in response to this comment. For informational purposes, the DWSP does not provide specific design standards for complete streets within downtown, rather it provides a vision of complete streets as a way to increase the frequency and safety of active transportation modes, such as walking and bicycling. Nonetheless, since 2017, City and the State have collaborated on preparation of three plans to improve road user safety on State Routes 129 and 152. These embrace the concept of Complete Streets and were prepared with and partially funded by Caltrans. They include the Downtown Watsonville Complete Streets Plan (completed in 2019), the Complete Streets to Schools Plan (2020) and the Downtown Watsonville Specific Plan (currently being prepared). Last year, Caltrans proposed State Highway Operation and Protection Program (SHOPP) Project No. 05-1P110 which includes a road diet on State Route 152 between Freedom Blvd and Beach Street. Prior to adding this project to the SHOPP, Caltrans requested that the City provide a resolution supporting the project. The Watsonville City Council held a study session on August 30, 2022 to allow the community to learn about and comment on the project. The Council adopted Resolution No. 195-22 (CM) in support of the project at its September 13, 2022 meeting. Subsequently, the City assisted Caltrans staff in hosting a virtual community meeting on October 6, 2022 to allow State staff to discuss upcoming projects in the Watsonville area and receive feedback on the project on SR 152. City staff worked with the following Caltrans District 5 staff as part of these efforts: Senior Transportation Planner Gus Alfaro, Jr.; Project Manager Heidi Borders; Design Manager Kyle Birch; Transportation Planner Paul Guirguis; and Senior Transportation Planner John Olejnik.

Response 2.5

The commenter expresses support for Mitigation Measure TRA-1, which requires each individual office and industrial development project in the study area to incorporate a transportation demand management (TDM) plan and monitoring program.

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The City appreciates Caltrans' support of Mitigation Measure TRA-1, which appears on pages 4.8-15 and 4.8-16 of the Draft EIR. This comment does not require revisions to the Draft EIR.

Response 2.6

The commenter states appreciation for the opportunity to comment on the Draft EIR and provides follow-up contact information for future coordination with Caltrans.

This comment is noted and does not require revisions to the Draft EIR.

Letter 3

COMMENTER: Marven E. Norman, Bike Santa Cruz County

DATE: June 26, 2023

Response 3.1

The commenter states that they have reviewed the Draft EIR and would like to provide comments.

This comment is a general introduction to a list of detailed comments provided later in the comment letter. This comment does not require revisions to the Draft EIR.

Response 3.2

The commenter states that the DWSP would remove the E Lake Avenue and E Beach Street couplet and create two-way streets. The commenter further states that this would upgrade bike facilities throughout downtown to provide a rudimentary bicycle network and “opportunity has been left on the table” regarding the visionary nature of the plan.

The commenter’s understanding of the proposed roadway and bicycle infrastructure improvements are an accurate summary of the project as proposed and evaluated in the Draft EIR. This comment pertains to the DWSP. This comment does not pertain to the Draft EIR and does not require revisions to the Draft EIR.

Response 3.3

The commenter states that the Draft EIR indicates traffic noise on Beach Street would increase because the amount of vehicle trips would increase, despite the DWSP envisioning the removal of Beach Street from SR 152. The commenter opines that traffic volumes would be better controlled if Beach Street be maintained as one-way for car traffic but alternate the one-way direction to be west and east from Alexander Street.

Consistent with Senate Bill 743 and the State CEQA Guidelines (Section 15064.3), the Draft EIR evaluates transportation impacts using Vehicle Miles Traveled (VMT) as the metric for determining significance. Pursuant to Section 15064.3 of the State CEQA Guidelines, traffic congestion is not a significant impact for purposes of CEQA. Accordingly, the Draft EIR is not required to attempt to reduce vehicle traffic through mitigation or other means.

Although traffic congestion is not a significant impact for CEQA, the commenter is correct that vehicle trips on Beach Trip would increase with implementation of the DWSP, as shown in Table 4.6-5 on page 4.6-12 of the Draft EIR. As shown in Table 4.6-5, the change in ambient noise levels along Beach Street resulting from these additional trips would range from 0.69 to 1.68 dBA CNEL. As described on page 4.6-1 of the Draft EIR, in general, a 3 dBA change in the ambient noise level is noticeable to the human ear, while 1-2 dBA changes generally are not perceived. Accordingly, the changes in ambient noise levels resulting from additional vehicle trips on Beach Street would not be noticeable or a significant impact, as described on page 4.6-11 of the Draft EIR. Therefore, this comment does not require revisions to the Draft EIR.

Response 3.4

The commenter states that the DWSP does not propose any Level of Traffic Stress 1 or Level of Traffic Stress 2 bike facilities through the central portion of the plan area which would perpetuate hazards by design. The commenter suggests that a Class IV bikeway, running opposite the one-way restrictions, should be provided on Beach Street to improve connectivity for bicyclists and be more in-line with Caltrans recommendations. The commenter provides a link to a study prepared by San Jose State University and a nonfunctional link to 2020 Caltrans document.

This comment relates to the DWSP and does not pertain to the Draft EIR. This comment is noted and does not require revisions to the Draft EIR. For informational purposes, the Draft EIR evaluates the potential for the DWSP to result in significant impacts related to conflicts with policies, programs, and plans addressing bicycle facilities. Specifically, Impact TRA-1 beginning on page 4.8-13 of the Draft EIR describes how the DWSP would not conflict with such plans, programs, and policies because the DWSP would improve bicycle connectivity in the plan area. Additionally, as described on page 4.8-13 of the Draft EIR, 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 streets are in the central portion of the plan area, and the DWSP would expand these bicycle facilities.

Response 3.5

The commenter recommends a bicycle lane on Beach Street and preserving a portion of the vacated Union Street for bicyclists and pedestrians. The commenter provides links to examples of bicycle facilities in other cities.

The City recognizes the importance of reducing the dependency on single-occupancy vehicles and understands increasing active transportation modes, such as bicycling and walking, is an effective means at reducing vehicle use. For these reasons, the DWSP does envision a comprehensive bicycle network through the plan area, including the central portion of the plan area. As shown on Figure 4-11 on page 116 of the DWSP, bicycle lanes would extend both north-south and east-west across the plan area on multiple streets. An east-west oriented bicycle lane would be provided on Union Street which would transition to Brennan Street. This bicycle lane would pass Watsonville Plaza, which is the central portion of the plan area. A bicycle lane would be present on 2nd Street in a north-south alignment, passing just east of Watsonville Plaza, as also shown on Figure 4-11. Accordingly, the DWSP does envision providing bicycle lanes in the central portion of the plan area in a such a way as to provide both east-west and north-south travel, as suggested by the commenter.

Because this comment pertains to the future bicycle network envisioned in the DWSP and does not pertain to the Draft EIR, revisions to the Draft EIR are not required in response to this comment.

Response 3.6

The commenter requests that the proposed Main Street/Freedom Boulevard roundabout be designed to meet the standards for vision impairments identified by the National Cooperative Highway Research Program as well as use the designs provided in the Massachusetts Department of Transportation bikeway guide for designing the bikeway around the roundabout.

This comment pertains to specific design standards for a roadway roundabout, as planned within the DWSP. The DWSP provides an overall vision for the downtown area of Watsonville and does not provide or propose design-level details. Individual projects in the plan area will be designed at various points in the future. When the Main Street/Freedom Boulevard roundabout is designed, the

design and construction would be compliant with Caltrans standards, such as those provided in Chapter 400 of the Caltrans Highway Design Manual. Section 405.10 of Chapter 400 provides standards for roundabouts, including design standards to accommodate vision impairment. This comment is noted and does not require revisions to the Draft EIR.

Response 3.7

The commenter states appreciation for the opportunity to comment on the Draft EIR and provides follow-up contact information for any follow-up questions the City might have.

This comment is noted and does not require revisions to the Draft EIR.

Letter 4

COMMENTER: Steve Trujillo

DATE: May 31, 2023

Response 4.1

The commenter asks if the EIR will measure the effect on air quality resulting from a lane reduction along Main Street, as envisioned in the DWSP.

Appendix G of the State CEQA Guidelines provides a list of environmental factors that lead agencies should consider evaluating in the CEQA documents. Among the environmental factors listed in Appendix G is air quality. Accordingly, consistent with the State CEQA Guidelines, Section 4.2, *Air Quality*, of the Draft EIR evaluates the potential air quality impacts that would result from implementation of the DWSP.

The analysis of air quality impacts in the Draft EIR does not include a separate calculation of air pollutant emissions associated with the road diet on Main Street that is envisioned in the DWSP. Instead, as described on page 4.2-15 of the Draft EIR, operational emissions of the entire buildout of the DWSP, collectively, were estimated using the California Emissions Estimator Model (CalEEMod). The number of vehicles trips anticipated in the plan area with implementation of the DWSP were input into CalEEMod to determine their emissions, which is referred to as mobile-source emissions. The anticipated vehicle trips were based on a Transportation Impact Analysis prepared for the DWSP by Kimley Horn in March 2023 (see Appendix E of the Draft EIR).

As discussed on pages 4.2-15 through 4.2-19 of the Draft EIR, the additional housing envisioned in the DWSP would contribute to population growth that conflicts with the growth assumptions in the Air Quality Management Plan and long-term operational impacts of the DWSP, including mobile-source emissions, would exceed the Monterey Bay Air Resources District's significance thresholds. The Draft EIR provides Mitigation Measure AQ-1 on page 4.2-16 to reduce operational emissions. However, even with implementation of Mitigation Measure AQ-1, operational emissions would result in significant and unavoidable impacts, as described on pages 4.2-18 and 4.2-19 of the Draft EIR.

This comment does not pertain to the adequacy of the analysis summarized above. Therefore, no revisions to the Draft EIR are required.

Response 4.2

The commenter asks if the EIR will examine the cooling effect of more trees downtown on temperature.

CEQA does not require an evaluation of cooling effect of more trees. It is commonly known that trees provide shade and can have a cooling effect. Generally, this would be a positive outcome for most land uses, especially in downtown settings where direct sunlight is less important than other non-urban land uses, such as agriculture. As noted in the DWSP, street trees are an important component of the public realm because of their ability to provide a consistent and uniform street character while also reducing the "heat island effect."

Although CEQA does not require an assessment of cooling from trees, there are other CEQA topics that pertain to trees. As discussed within Section 4.1, *Aesthetics*, the DWSP includes Policy 5.F which

requires considerations for project appearance including the retention of trees (see Draft EIR page 4.1-5). Furthermore, Section 4.3, *Biological Resources*, of the Draft EIR describes the City of Watsonville Tree Protection Policies which would require permits to be issued for removal or trimming of trees along public streets downtown.

This comment does not pertain to the adequacy of the Draft EIR analysis and therefore does not require revisions to the Draft EIR.

Response 4.3

The commenter asks if the EIR will measure the increase in water demand resulting from the proposed residential and commercial growth.

As discussed on page 1-12 of the Draft EIR and pages 66-68 of the Initial Study (Appendix A to the Draft EIR), future development envisioned in the DWSP would increase demand for water. However, 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.

This comment does not pertain to the adequacy of the Draft EIR water demand analysis. Therefore, no revisions to the Draft EIR are necessary in response to this comment.

Response 4.4

The commenter asks if the EIR will evaluate the projected wastewater demand for the existing wastewater facilities.

As discussed on page 1-12 of the Draft EIR and pages 68-69 of the Initial Study (Appendix A to the Draft EIR), 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 and impacts would be less than significant.

This comment does not pertain to the adequacy of the Draft EIR wastewater analysis. Therefore, no revisions to the Draft EIR are necessary in response to this comment.

Response 4.5

The commenter asks if the EIR will measure the increased need for parking in downtown.

CEQA does not require an evaluation of parking standards or guidelines to be included within the EIR. However, as discussed within Chapter 2, *Project Description*, the DWSP includes several roadway improvements to support multimodal travel, increase safety, and improve access to local amenities and businesses. Table 2-2 on page 2-12 of the Draft EIR describes these improvements and the preservation of existing and on-street parking for various roadways within the plan area. In addition, the DWSP encourages shared parking and calls for prioritizing infill development of off-street parking lots that are underutilized and not the highest and best use of land.

This comment is noted and does not require revisions to the Draft EIR.

3 Errata to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strikethrough~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 Revisions to the Draft EIR

Pages ES-10 and ES-11 and also pages 4.3-7 and 4.3-8 of the Draft EIR are revised as follows:

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— an experienced botanist, familiar with the native plant communities of Santa Cruz County, shall conduct a focused Santa Cruz tarplant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire project area where potential Santa Cruz tarplant habitat has been identified, prior to the initiation of construction and the results shall be included in the project environmental document. Surveys shall be conducted according to CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities.~~

If Santa Cruz tarplant is detected or likely to occur within the project area, additional measures may be needed to avoid, minimize, and/or mitigate potential project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the project proponent shall obtain an ITP pursuant to Fish and Game Code section 2081, subdivision (b) (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9). 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.

Pages ES-11 and ES-12 and also page 4.3-8 of the Draft EIR is revised as follows:

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. If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos.~~
~~Surveys shall be conducted at the appropriate times of day and during appropriate nesting times. 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 the qualified biologist documents active nests within the project area or in nearby surrounding areas, a species appropriate buffer between the nest and active construction shall be established by the biologist. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of the nest to characterize "normal" bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active. 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.~~

Appendix 1

Comment Letters



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Bay Delta Region
 2825 Cordelia Road, Suite 100
 Fairfield, CA 94534
 (707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



LETTER 1

June 15, 2023

Mr. Justin Meek
 City of Watsonville
 250 Main Street
 Watsonville, CA 95076
Justin.Meek@cityofwatsonville.org

Subject: Downtown Watsonville Specific Plan, Draft Environmental Impact Report,
 SCH No. 2022100602, City of Watsonville, Santa Cruz County

Dear Mr. Meek:

The California Department of Fish and Wildlife (CDFW) has received and reviewed the draft Environmental Impact Report (EIR) prepared by the City of Watsonville (City) for the Downtown Watsonville Specific Plan (Project), located in Santa Cruz County, pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW submits these comments on the draft EIR to inform the City, as the CEQA Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting these comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take," as defined by State law, of any

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

1.1

1.2

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species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or Native Plant Protection Act (NPPA) (Fish & G. Code, § 1900 et seq.), related authorization as provided by the Fish and Game Code will be required.

1.2

REGULATORY REQUIREMENTS

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA or NPPA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. “Take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). If the Project will impact CESA or NPPA listed species, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. CDFW’s issuance of an ITP is subject to CEQA and to facilitate Permit issuance, any such project modifications and mitigation measures must be incorporated into the draft EIR’s analysis, discussion, and mitigation monitoring and reporting program.

CEQA requires a mandatory finding of significance if a Project is likely to substantially impact threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA; however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

1.3

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes, streams, rivers, or associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

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Raptors and Other Nesting Birds

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

1.3

Fully Protected Species

Fully Protected species may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

PROJECT DESCRIPTION SUMMARY

Proponent: City of Watsonville

Objective: The Project consists of the Downtown Watsonville Specific Plan. The Project would establish new zones, overlays, and development standards and guidelines to guide development. The Project would help the City of Watsonville achieve its objective of incorporating higher density commercial and housing opportunities by accommodating residential uses in a compact and active mixed-use environment through both new construction and adaptive reuse of historic or existing buildings. The Project would incorporate the following: 1) addition of up to 3,886 new residential units; 2) 231,151 square feet of commercial development; 3) 376,827 square feet of industrial development; 4) 114,572 square feet of civic space within the downtown area over the next 25 years; and 5) provision of multi-modal transportation options in the downtown area, such as vehicle, transit, bicycle, and pedestrian mode options. It includes design concepts for downtown streets, as well as bicycle and pedestrian network improvements.

1.4

Timeframe: The plan will be implemented over the next 25 years.

ENVIRONMENTAL SETTING AND LOCATION

The Project is located in Downtown Watsonville in the southern area of Santa Cruz County. The Downtown Watsonville Specific Plan Area covers roughly 195.5 acres within Downtown Watsonville, with about 55.5 acres dedicated to streets and right-of-way. Downtown is centered on Main Street and extends west to the edge of existing neighborhoods and the industrial district, south to the Pajaro River, 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

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area is a part of SR 129. One of the major intersections within the plan area is the intersection of Main Street and SR 129. 1.4

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. 1.5

COMMENT 1: Santa Cruz Tarplant ITP

Issue: The draft EIR states that Santa Cruz tarplant (*Holocarpha macradenia*) may be impacted by the Project, but the proposed mitigation measures do not reference obtaining an ITP if there is the potential for take of Santa Cruz tarplant.

Evidence the impact would be significant: Santa Cruz tarplant is an endangered species under CESA (Fish & G. Code, § 2050 et seq.). Species listed under CESA may not be taken² at any time except under the provisions of a Natural Communities Conservation Plan (NCCP), (Fish & G Code § 2081.7), a Memorandum of Understanding for scientific education or management purposes (Fish & G. Code §2081, subd. (a)), or an ITP (Fish & G. Code § 2081 (b)).

Santa Cruz tarplant is an annual species and the number of individuals recorded in a year is highly dependent on rainfall and other factors. Santa Cruz tarplant produces two types of seeds, ray achenes and disk achenes (U.S. Fish and Wildlife Service [USFWS] 2014). Generally, the seeds fall within the vicinity of the plant and do not have a structural means for dispersal, although it is possible that some ray achenes may be dispersed long distances by animals (USWFS 2014). Ray achenes also form lasting seed banks with seeds that remain viable for an unknown amount of time, with seeds up to 15 years old successfully germinating (USFWS 2014). Surveys over consecutive seasons may be necessary to increase the likelihood of detection and account for variances in weather and other disturbances from year to year to determine the potential for take. 1.6

Recommended Mitigation Measure 1 – Focused Survey: Prior to commencement of construction activities on property with undeveloped areas or unmaintained landscaping, an experienced botanist, familiar with the native plant communities of Santa Cruz County shall conduct a focused Santa Cruz tarplant survey during the blooming period of the species, from June to October. The surveys shall occur throughout the entire Project where potential Santa Cruz tarplant habitat has been identified, prior to the initiation of construction and the results shall be included in the Project environmental document. Surveys shall be conducted according to: Protocols for Surveying and Evaluating

² Take is defined in Fish & G. Code, § 86 as hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

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Impacts to Special-Status Native Plant Populations and Natural Communities (CDFW 2018), available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

Recommended Mitigation Measure 2 – Santa Cruz Tarplant Avoidance and

Mitigation: If Santa Cruz tarplant is detected or likely to occur within the Project area, additional measures may be needed to avoid, minimize, and/or mitigate potential Project impacts. Measures may include work stoppage, flagging and avoidance of occurrences, collection of propagation material, and/or site restoration. In the event that State-listed plants cannot be avoided during construction, the Project proponent shall obtain an ITP pursuant to Fish and Game Code section 2081, subdivision (b) (See cal. Code Regs., tit. 14, §§ 783.4 & 786.9). Information on the ITP process is available at <https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>. In addition, CDFW recommends continued coordination to develop additional measures.

1.6

COMMENT 2: Nesting Bird Surveys

Issue: The draft EIR proposes to implement mitigation measure Bio-2: Nesting Bird Avoidance to mitigate for impacts to nesting birds; however, the measure does not state that baseline data will be collected if active nests are discovered or provide the qualified biologist with stop work authorization.

Recommended Mitigation Measure 3 – Nesting Bird Surveys. If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day and during appropriate nesting times.

1.7

Recommended Mitigation Measure 4 – Active Nest Protections. If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, a species appropriate buffer between the nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall

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have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active.

1.7

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

1.8

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

1.9

CONCLUSION

Thank you for the opportunity to comment on the Project's draft EIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Ms. Serena Stumpf, Environmental Scientist, at (707) 337-1364 or Serena.Stumpf@wildlife.ca.gov; or Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

1.10

Sincerely,

DocuSigned by:

Erin Chappell

B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2022100602)

REFERENCES

[USFWS] U.S. Fish and Wildlife Service. 2014. *Holocarpha macradenia* (Santa Cruz tarplant) 5-Year Review: Summary and Evaluation. U.S. Fish and Wildlife Service, Ventura, California.

California Department of Transportation

CALTRANS DISTRICT 5
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415
(805) 549-3101 | FAX (805) 549-3329 TTY 711
www.dot.ca.gov



June 26, 2023

SCr/VAR
SCH#2022100602

Justin Meek, Principal Planner
City of Watsonville
Community Development Department
250 Main Street
Watsonville, CA 95076

COMMENTS FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) – DOWNTOWN WATSONVILLE SPECIFIC PLAN, WATSONVILLE, CA

Dear Mr. Meek:

The California Department of Transportation (Caltrans), District 5, Development Review, has reviewed the Downtown Watsonville Specific Plan DEIR which articulates a community vision and a planning framework for the downtown area 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. Caltrans offers the following comments in response to the DEIR:

1. Caltrans looks forward to working with the City of Watsonville on the feasibility of future transportation concepts when the time presents itself. Additional traffic studies will be needed for any operational changes on the state highway system (SHS). For example, any proposed changes to the type of intersection control would require an Intersection Control Evaluation (ICE) to be performed. 2.1
2. Further, the current performance metric used by the state to evaluate operational changes to the SHS is Daily Vehicle Hours of Delay (DVHD). The proposed road diet would increase the amount of DVHD and Caltrans will need to know what the DVHD would be from a corridor wide approach in future studies. 2.2
3. To move forward, Caltrans requests the City of Watsonville to provide a resolution or a letter of support at the appropriate time when complete street changes to the SHS are planned to reaffirm the concepts are still supported. Examples would include removing parking and lane reduction. 2.3
4. 2.4

4. Caltrans supports Mitigation Measure TRA-1 which requires each individual office and industrial development project in the study area to incorporate a transportation demand management (TDM) plan and monitoring program. This measure will appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

2.5

Thank you for the opportunity to review and comment on the proposed project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6543 or email christopher.bjornstad@dot.ca.gov.

2.6

Sincerely,

Christopher Bjornstad

Chris Bjornstad

Associate Transportation Planner

District 5 Land Development Review

LETTER 3

26 June 2023

City of Watsonville
Attn: Justin Meek, AICP, Principal Planner
250 Main Street
Watsonville, CA 95076
Submitted via email to justin.meek@cityofwatsonville.org.

Re: Downtown Watsonville Specific Plan Draft Environmental Impact Report (SCH #2022100602)

Dear Justin Meek,

This letter is to respond to the DEIR for the proposed Downtown Watsonville Specific Plan which has been made available for review. After looking over the documents, I would like to provide the following comments.

3.1

Based on the information provided in the DEIR and Transportation study, the Plan would remove the E Lake Avenue and E Beach Street couplet by (re)turning them from the present situation of one-way to two-way streets. Additionally, this would upgrade bike facilities on several thoroughfares in the downtown area, providing a rudimentary network of bike facilities. While these are welcome changes which will certainly improve the livability of downtown Watsonville, it appears that opportunity has been left on the table, particularly given the visionary nature of the Plan.

3.2

The first concern to address is the plan to convert Lake Avenue and Beach Street to two-way operations. It is stated that there will be a goal of removing Beach St. from being part of SR-152 once the conversion is complete. However, Table 4.6-5 Traffic Noise Increase shows that traffic counts would still increase over present on Beach Street, drawing into question the benefit that would be achieved from that change. Instead, it would be preferable to maintain Beach Street as one-way for car traffic but alternate the one-way direction to be west and east from Alexander Street such that it is no longer usable as a through route. Doing so would help better control traffic counts and when combined with traffic calming elements on Beach Street, would keep speeds down and create a far more inviting environment commensurate with a revitalized downtown, particularly since there is also a high school located at Beach and Merchant.

3.3

At the same time, Figure 2-8 DWSP Future Bicycle Network (Figure 1) shows that at present, there is no plan to provide any LTS1 or LTS2 bike facilities¹ through the central portion of the Plan area, potentially perpetuating hazards by design. To remedy that shortcoming, a Class IV bikeway in the opposite direction of the one-way restrictions should also be provided on Beach Street which would be more in line with Caltrans recommendations² and go far toward improving connectivity for bicyclists. Additionally, the proposal to vacate a portion of Union Street and realign with Alexander Street must either preserve a portion of the vacated right-of-way for bicyclists and pedestrians or perhaps provide an easement for a connection through the development such as the passage in the Rijksmuseum in Amsterdam³ or the soon-to-be-completed Sherwin-Williams development in

3.4

3.5

¹ <https://transweb.sjsu.edu/research/Low-Stress-Bicycling-and-Network-Connectivity>

² Flournoy, M. (2020). Contextual guidance for bike facilities. Caltrans. Retrieved from <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/planning-contextual-guidance-memo-03-11-20-a11y.pdf>.

³ <https://www.youtube.com/watch?v=2BbgdRdZI4o>

Emeryville.⁴ This can be continued on the south side of realigned Union/Alexander to the Lake/Brennan intersection where a protected intersection would facilitate crossing. | 3.5

Finally, it is encouraging to see that a roundabout is being planned for the intersection of Main Street and Freedom Boulevard, however, no mention was made of what measures would be taken to ensure that the roundabout remains safe for all users, including bicyclists and individuals with vision impairments. It is imperative that the roundabout be designed to meet the standards for vision impairments identified by the National Cooperative Highway Research Program⁵ as well as use the designs provided in the MassDOT bikeway guide for designing the bikeway around the roundabout,⁶ particularly since there is already a trail along Main Street north of Freedom Boulevard. | 3.6

Thank you for your time and receiving these comments. If there are any questions, please do not hesitate to contact me. | 3.7

Sincerely,

Marven E. Norman

CC: Bike Santa Cruz County

⁴ <https://www.ci.emeryville.ca.us/1019/Sherwin-Williams>

⁵ Schroeder, B. J. (2011). *Crossing solutions at roundabouts and channelized turn lanes for pedestrians with vision disabilities* (Vol. 674). Transportation Research Board.

⁶ Found online at <https://www.mass.gov/doc/chapter-4-intersection-design-0/download>.

Figure 2-8 DWSP Future Bicycle Network

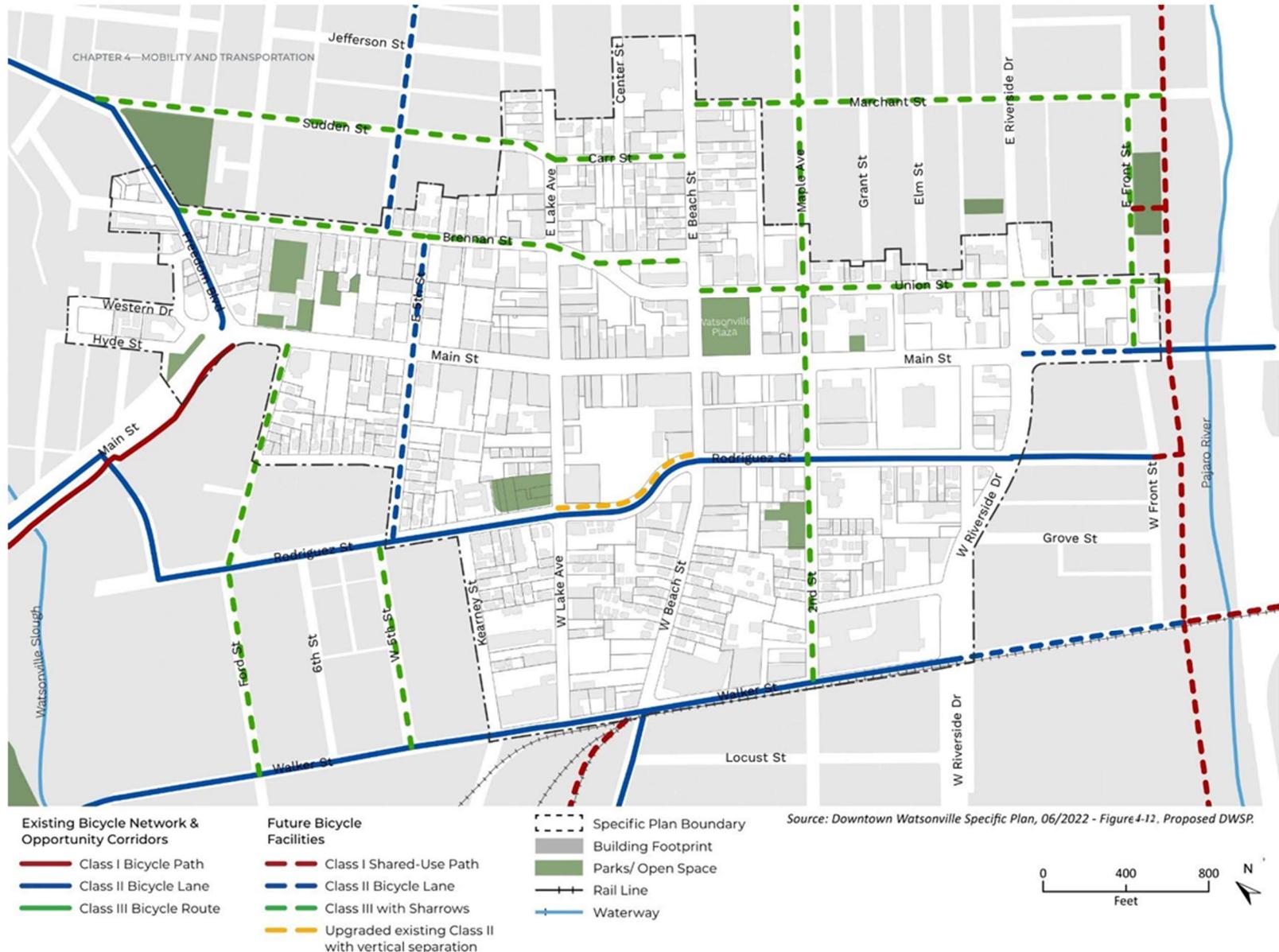


Figure 1: Figure 2-8 DWSP Future Bicycle Network taken from DWSP DEIR depicting a lack of low-stress bikeway connectivity through the core of the Plan area.

Re: Notice of Availability of an EIR for the DWSP

steve trujillo <cruztbone@yahoo.com>

Wed 5/31/2023 8:35 PM

To: Justin Meek <justin.meek@watsonville.gov>

questions;

1. will the EIR measure the effect of half as many lanes on air quality on Main street downtown?	4.1
2. will the EIR examine the cooling effect of more downtown trees on the temperature?	4.2
3. will the EIR measure the increase in water needs for a greater population and more food/beverage places?	4.3
4. will the EIR measure the amount of sewage produced for our waste treatment plant for increased number of people downtown ?	4.4
5. will the EIR measure the increased need for parking in downtown?	4.5

and i can come up with more. but these need to be answered by the EIR.

Steve Trujillo

On Wednesday, May 31, 2023 at 02:25:51 PM PDT, Justin Meek <justin.meek@watsonville.gov> wrote:

Dear Interested Party,

You are receiving this email because you expressed previously a wish to be informed of upcoming events or updates concerning the [Downtown Watsonville Specific Plan \(DWSP\)](#).

The environmental review for the DWSP is underway. A [Notice of Availability \(NOA\)](#) has been given that a [Draft Environmental Impact Report \(EIR\)](#) for the [DWSP](#) is available for public review. Public comments pertaining to the Draft EIR may be submitted through June 26, 2023.

The purpose of the EIR is to evaluate the potential physical effects of the proposed DWSP would have on the environment. Here are some key highlights:

- Through the Draft EIR process, the DWSP was determined to have significant and unavoidable impacts to air quality, cultural resources, noise, and transportation.
- Impacts to biological resources, geology and soils, hazards and hazardous materials, and tribal cultural resources were found to be potentially significant but mitigable to less than significant.
- Impacts to other resource areas and environmental topics evaluated in the EIR were found to be less than significant without mitigation.

The City of Watsonville is soliciting comments on the Draft EIR. Comments provided will be considered in the Final EIR in accordance with section 15088 of the [State CEQA Guidelines](#).

Best regards,
Justin Meek

P.S. If you received this email in error or do not wish to receive future emails concerning the DWSP, simply reply to this email and type "unsubscribe" in the subject line.



Justin Meek, AICP | Principal Planner

City of Watsonville

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