100 Manabe Ow Road Industrial Project

Initial Study / Mitigated Negative Declaration

Community Development Department

250 Main Street

Watsonville, CA 95076

May 2023

Prepared with the assistance of MIG, Inc.

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Chapter 1. Introduction

This Initial Study has been prepared to conform to the requirements of Public Resources Code Sections 21000 *et seq*. - California Environmental Quality Act (CEQA), the California Code of Regulations - Section 15000 *et seq*. (CEQA Guidelines), and the regulations and policies of the City of Watsonville. The Initial Study is intended to inform City of Watsonville (City) decision-makers, responsible agencies, and the general public of the 100 Manabe Ow Road Industrial Project (project) and its environmental consequences. The City is the Lead Agency under CEQA and has prepared this Initial Study to address the impacts of implementing the proposed project. The primary objective of the project is to build an industrial warehouse distribution center building totaling 175,760 square feet, including approximately 10,000 square feet of office space.

1.1 PROJECT BACKGROUND AND OVERVIEW

The project site is currently vacant and is located within a planned business park (Manabe Ow Business Park Specific Plan), at 100 Manabe Ow Road (APN 018-711-38) at the southwest corner of the intersection of Manabe Ow Road and Ohlone Parkway in the southwest portion of the City. The project proposes to construct a rectangular shaped one-story industrial warehouse structure totaling 175,760 square feet, which includes 10,000 square feet of office space half of which is proposed to be located on an interior mezzanine level. The future tenant of the building is speculative at this time, but the proposed warehouse is anticipated to function as a distribution facility that operates 24 hours per day, Monday through Sunday (7-days per week)*.*

The future tenant and thus specific use of the building is speculative at this time, but future uses could include warehousing/storage for dry goods, truck trailer/container storage, or other uses permitted by the Manabe-Ow Business Park Specific Plan. The Specific Plan states that light industrial uses are permitted within the Business Park District and warehouses exceeding 30 percent of the floor area of a business require a Special Use Permit. Accordingly, the project would be subject to the approval of a Design Review and a Tier Two Special Use Permit by the Planning Commission. The Manabe Ow Business Park Specific Plan states, “A Special Use Permit is required for any use with the potential to generate significant impacts such as noise, odor, use of hazardous materials, significant water demand, or any use that is difficult to clearly classify as a business park use. The Zoning Administrator or designated staff member shall make the determination when Tier Two review (Special Use Permit review) is required in accordance with Chapter 6, Section 5 of this Specific Plan. Any warehousing exceeding 30 percent of the floor area of a business will require a Special Use Permit. No use that requires overnight residential occupancy will be allowed within the Business Park District”. There would be no further entitlements required for the project prior to grading/building permit issuance.

Cold storage uses are permitted by the Specific Plan, but they are not currently proposed with this project. If cold storage uses, which require refrigeration equipment in the building and the use of refrigerated trucks, are proposed at a future date, a Major Revision to the Special Use Permit (WMC §14-12.1000) and subsequent CEQA review would be required due to the potential for higher emissions of air quality pollutants, noise, and other impacts to the environment and surrounding community. A Condition of Approval is included in the project to state these requirements.

The proposed building contains 41 truck docks, located at the rear of the building. The project includes a Condition of Approval that only allows nine (9) dock packages (the kits containing the doors that allow the docks to be utilized) to be installed with the initial construction of the building. Additional dock packages may be added as a tenant improvement for the future building tenant(s), however, the Condition of Approval also states that any future proposal to use additional dock doors shall require a Design Review Permit (WMC §14-12.400), a Major Revision to the Special Use Permit (WMC §14-12.1000), and subsequent CEQA review.

The Manabe Ow Road frontage area would be landscaped and includes two stormwater retention/detention basins totaling 39,991 square feet in area. Future uses or warehouse configurations not expressly described or analyzed as part of this project such as the use of cold storage or transportation refrigeration units (TCUs), the use or storage of hazardous materials, or additional dock packages will require an amendment to the Special Use Permit and subsequent CEQA review.

Construction is anticipated to last approximately 17 months and include the following phases:

- ground improvement (soil surcharge),
- site clearing/rough grading,
- pad construction,
- panel tilt for building,
- roof enclosure,
- site paving/landscaping, and
- site cleanup/finishing.

1.2 REGULATORY GUIDANCE

CEQA and the CEQA Guidelines establish the City of Watsonville (City) as the lead agency for the project. The lead agency is defined in CEQA Guidelines Section 15367 as, “the public agency which has the principal responsibility for carrying out or approving a project.” The lead agency is responsible for preparing the appropriate environmental review document under CEQA. The Watsonville Planning Commission is the decision-making body for the City responsible for adopting the CEQA document and approving the project.

CEQA Guidelines Section 15070 states a public agency shall prepare a proposed Negative Declaration or a Mitigated Negative Declaration when:

1. The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

2. The Initial Study identifies potentially significant effects, but:

    - Revisions in the project plans made before a proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where no significant effects would occur, and

- There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Pursuant to Section 15070, the City has determined a Mitigated Negative Declaration is the appropriate environmental review document for the 100 Manabe Ow Road Industrial Project because while this Initial Study identifies potentially significant impacts that may result from the project it also identifies mitigation measures that can be implemented to avoid or mitigate those impacts to insignificant levels.

To ensure that the mitigation measures and project revisions identified in a Mitigated Negative Declaration (MND) are implemented, CEQA Guidelines Section 15097(a) requires the City to adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. The City shall prepare a Mitigation, Monitoring and Reporting Plan (MMRP) based on the mitigation measures contained in this IS/MND and require the measures listed in the MMRP be complied with as conditions of any project approval.

1.3 LEAD AGENCY CONTACT INFORMATION

The lead agency for the project is the City of Watsonville. The contact person for the lead agency is:

Matt Orbach, Principal Planner
City of Watsonville Community Development Department
Planning Division
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Watsonville, CA 95076
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matt.orbach@watsonville.gov

1.4 DOCUMENT PURPOSE AND ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of the 100 Manabe Ow Road Industrial Project. This document is organized as follows:

- Chapter 1 – Introduction. This chapter introduces the project and describes the purpose and organization of this document.

- Chapter 2 – Project Description. This chapter describes the project location, area, site, objectives, and characteristics.

- Chapter 3 – Environmental Checklist and Responses. This chapter contains the Environmental Checklist that provides a discussion and analyzes and identifies the significance of potential environmental impacts (by environmental issue) that could result from implementation of the proposed project. This chapter also contains the Mandatory Findings of Significance.

- Chapter 4 – Report Preparation. This chapter provides a list of those involved in the preparation of this document.

- Appendices

Chapter 2. Project Description

2.1 PROJECT PURPOSE

The purpose of the project is to construct an industrial warehouse facility.

2.2 PROJECT LOCATION AND SURROUNDING LAND USES

The project site is located at 100 Manabe Ow Road, (APNs 018-711-35 & 37) at the southwest corner of the intersection of Manabe Ow Road and Ohlone Parkway in the southwest portion of the City. California State Route 1 (SR 1) lies approximately 1,700 feet to the west and a Southern Pacific Railroad right-of-way runs adjacent to the southern border of the site. West Beach Street is located approximately 600 feet south of the site. (See Figure 1, Regional Location Map and Figure 2, Site Location)

In addition to the primary development site, the project also includes the stockpiling of fill soil and use of an access route on a separate property located to the east of Ohlone Parkway, as indicated on Figure 2. This Initial Study includes an analysis of the biological resources present and the potential impacts associated with the proposed stockpiling of the fill material and use of the access route on this offsite location. (See Chapter 3.4 Biological Resources)

Surrounding Land Uses. The vacant development site is located within a planned business park (Manabe Ow Business Park Specific Plan) and is bordered on the north by Manabe Ow Road and Watsonville Slough. An unpaved pedestrian/bike trail runs along the northern edge of the slough. Beyond the slough to the north is an existing single-family residential neighborhood, and a FedEx distribution warehouse is located adjacent to the west side of the subdivision. To the east of the project site across Ohlone Parkway is additional vacant land within the business park boundaries that extends eastward between Watsonville Slough and the railroad right-of-way for approximately 1/3-mile. To the west of the project site are 11.5 acres of vacant land with approved entitlements for construction of a 155,847-square-foot warehouse/distribution facility. There are various existing industrial and distribution warehouse uses located south of the railroad right-of-way, including a food distribution center, lumber store, scrap metal business, and packaging companies.

The proposed project includes the export of approximately 24,000 cubic yards of soil from 100 Manabe Ow Road to a parcel located across Ohlone Parkway from the project site (APN: 018-711-31). The proposed stockpiling site and access route are currently vacant and are adjacent to the existing railroad right-of-way. Existing land uses across the railroad right-of-way to the south include a lumber store, a packaging supply store, and a biodiesel fuel plant. The land to the north and east is also currently vacant and contains grasses and weedy and shrubby vegetation. The Watsonville Slough corridor and trail are located between approximately 200 and 400 feet to the north of the proposed stockpiling area.

General Plan and Zoning. The project site is designated as Industrial on the General Plan Land Use Map and is within the Industrial Park (IP) Zoning District. Additionally, the site is designated as Business Park within the Manabe-Ow Business Park Specific Plan (MOBPSP or Specific Plan).

2.3 SITE FEATURES

The site is currently undeveloped with limited shrubby vegetation around the perimeter of the site. There is an existing agricultural irrigation well and associated service poles in the southwest corner of the site that are proposed for removal. Under On/Off Site Grading Permit #1029, issued on March 9, 2021, the applicant imported, placed, and compacted 20,000 cubic yards of fill material to surcharge the site. As a result, the eastern approximately 2/3 of the interior of the site has been cleared of vegetation. There are no existing trees on the site. The project frontage along Manabe Ow Road is improved with curb, gutter, sidewalk, and storm drain facilities which extend around the corner of the site at Ohlone Parkway, and south along the Ohlone Parkway frontage for a distance of approximately 150 feet. The remainder of the project site's Ohlone Parkway frontage is unimproved. Manabe Ow Road contains Class II bike lanes in each direction along the frontage of the site. The intersection of Manabe Ow Road and Ohlone Parkway is fully improved with a traffic circle containing a landscaped center island, crosswalks, and ADA access ramps on Manabe Ow Road and Ohlone Parkway. The eastern side of the traffic circle contains bollards and fencing at the edge of the traffic lane to indicate the terminus of the easterly leg of the intersection, and a temporary asphalt sidewalk connecting the existing concrete sidewalks on the north and south sides of the intersection. A future bike trail is shown just south of the southern boundary of the project site. Site photos are shown on Figure 3 through Figure 7.

2.4 PROJECT FEATURES

The project proposes to construct a rectangular shaped one-story industrial warehouse structure with a two-story office, totaling 175,760 square feet. The building contains 10,000 square feet of office space, half of which will be located on an interior mezzanine level. The proposed building has a 32-foot high interior clearance, a 43-foot exterior height, and space for 41 truck docks located at the rear of the building. The project includes a Condition of Approval that only allows nine (9) dock packages (the kits containing the doors that allow the docks to be utilized) to be installed with the initial construction of the building. Additional dock packages may be added as a tenant improvement for the future building tenant(s), however, the Condition of Approval also states that any future proposal to use additional dock doors shall require a Design Review Permit (WMC §14-12.400), a Major Revision to the Special Use Permit (WMC §14-12.1000), and additional CEQA review.

The Manabe Ow Road frontage area would be landscaped and includes two stormwater retention/detention basins totaling 39,991 square feet in area. The overall site plan is shown in Figure 8. Building elevations and perspective views are shown in Figure 9 and Figure 10, respectively.

The future tenant of the building is speculative at this time, but the proposed warehouse is anticipated to function as a distribution facility that operates 24 hours per day, Monday through Sunday (7-days per week), with 60 employees. Future uses could include warehousing/storage for dry goods, truck trailer/container storage, or other uses permitted by the MOBPSP. The Specific Plan states that, "All non-prohibited uses typical of business parks or light industrial areas are permitted including but not limited to manufacturing, construction and trades related, business and financial services, research and development, educational/research partnerships, medical

facilities and medical research, technical services, agricultural processing, energy services technologies, etc. A Special Use Permit would be required for any use with the potential to generate significant impacts such as noise, odor, use of hazardous materials, significant water demand, or any use that is difficult to clearly classify as a business park use." The MOBSP states that light industrial uses are permitted within the Business Park District and warehouses exceeding 30 percent of the floor area of a business require a Special Use Permit. The MOBPSP further states, "The Zoning Administrator or designated staff member shall make the determination when Tier Two review (Special Use Permit review) is required in accordance with Chapter 6, Section 5 of this Specific Plan." Accordingly, it was determined that the project would be subject to the approval of a Design Review and a Tier Two Special Use Permit by the Planning Commission. There would be no further entitlements required for the project prior to grading/building permit issuance.

As noted in Chapter 1, future uses or warehouse configurations not expressly described or analyzed as part of this project such as the use of cold storage or transportation refrigeration units (TCUs), the use or storage of hazardous materials, or additional dock packages will require a Major Revision to the Special Use Permit and additional CEQA review.

Circulation and Parking

The project would include three access driveways along the Manabe Ow Road frontage of the site: one 40-foot wide full access (two-way) driveway located near the western site boundary primarily for trucks and heavy vehicles, providing access to the truck parking areas on the west and south sides of the building and the loading bays on the south side of the building; and two 25-foot wide driveways for passenger vehicles and delivery vans that provide access to the parking lot areas at the front and east sides of the building. Additionally, an exit only, 35-foot-wide driveway is proposed on Ohlone Parkway near the southeast corner of the site. This would provide egress from the truck parking areas along the south and west sides of the building as well as the auto parking area on the east side of the site. This driveway could be modified in the future to allow right-turn-in (ingress) from Ohlone Parkway if the building were to house multiple tenants. According to the traffic analysis prepared for the project, in the case of multiple tenants, a southbound right-turn pocket would be constructed at the Ohlone Parkway driveway to allow inbound trips. This scenario would result in a change in trip assignment which should not impact any off-site intersections, only the driveway trip assignment. Therefore, the off-site intersection level of service would remain the same as the single tenant scenario discussed in the report. If the multi-tenant option is implemented, a more in-depth study regarding parking and circulation analysis would be required to be submitted to the City as part of the tenant improvement package.

The project proposes to provide the following on-site parking:

- 75 standard automobile parking stalls
- 7 accessible stalls
- 18 designated future EV charging stalls (including installation of electrical conduit for future charging equipment, but no charging equipment installed)
- 99 trailer parking stalls
- 10 short-term bicycle parking stalls
- 10 long-term bicycle parking stalls

The short-term bicycle parking stalls are configured in bicycle racks located on the front/north (Manabe Ow Road) side of the building. The long-term bicycle parking facilities would be located inside the building, within the first-floor office area. The truck parking, loading and circulation areas located on the west and south sides of the building would be secured by wrought iron fencing along the western and southern property lines. Gates at the northern entrance to the truck parking and loading area and eastern exit from the truck parking and loading area would be set back an adequate distance from the street to allow on-site stacking without spillover onto Manabe Ow Road and Ohlone Parkway. The passenger vehicle parking areas on the front and east sides of the building have two-way drive aisles to allow cars to circulate and enter/exit from the 25-foot-wide driveways on Manabe Ow Road. Decorative concrete paving will be used at the driveway cuts on Manabe Ow Road and Ohlone Parkway.

The project proposes 100 total employee parking stalls, which exceeds the City's minimum parking requirements of 65 stalls for warehouse uses (5 plus 1 per employee) and 34 stalls for office uses (1 per 300 square feet of floor area). A 12-foot-wide access roadway is also planned along the southern property boundary with access from Ohlone Parkway, south of the proposed driveway, which will allow the City to access and maintain the water main located inside the southern lot line and the regional drainage channel adjacent to 200 Manabe Ow Road.

Landscaping

The project would remove existing brush and shrubs on the site, and install new landscaping including a variety of shrubs, groundcovers and trees around the borders of the site, adjacent to the building and walkways and within the parking areas. The proposed landscaping includes large canopy trees surrounding the bioretention basins and along the Manabe Ow Road frontage, accent trees at the project entrances, and tall screening shrubs along the perimeter security fencing. The landscaping includes approximately 39,991 square feet of bioretention area, configured in two basins located along the project frontage on Manabe Ow Road, flanking the westerly truck driveway. As discussed in Section 3.10.4, the bioretention basins are sized in accordance with the City's Post-Construction Stormwater Management Requirements to treat expected levels of runoff from the building roof, driveways, walkways, and parking lot surfaces. The floors of the basins, which are part of the project's onsite stormwater runoff treatment system, would be planted with irrigated hydroseed mix and the perimeters planted with a combination of deciduous and evergreen accent and canopy trees, which would complement the existing street

trees located in the park strip areas along Manabe Ow Road. The conceptual landscape plan is shown on Figure 11.

Lighting

Outdoor lighting for the project would be provided using pole-mounted LED fixtures in the parking areas. The number of fixtures per pole would vary with the location of the pole but would be determined by the lighting plan included in the project, see Figure 12. All of the fixtures would be cut-off type, with light being directed downward. The project also proposes to install two City standard pole-mounted streetlights along the project frontage on Ohlone Parkway. All proposed lighting would be designed in conformance with City standards.

Grading

The project site is relatively flat, however grading would be required for the construction of the proposed facilities to raise the building footprint above the FEMA Base Flood Elevation (BFE) of 23-24 feet. The proposed cut is approximately 40,200 cubic yards (CY) of material, with a proposed fill of approximately 15,700 CY. The import of fill would be required to create elevated building pads needed to construct finished floor elevations above the base flood elevations. The preliminary grading plan is shown on Figure 13

Estimated grading quantities are as follows (in cubic yards):

- Cut: 40,200
- Fill: 15,700 (15% surcharge)
- Excess: 24,500
- Surcharge (5 feet high): 36,100 (no compaction)
- Shortage 6,900

Construction

Construction is anticipated to last approximately 17 months and include the following phases: ground improvement (soil surcharge), site clearing/rough grading, pad construction, panel tilt for building, roof enclosure, site paving/landscaping, and site cleanup/finishing.

Sustainability

The proposed project would include the following sustainability features:

- The project would implement a Transportation Demand Management (TDM) Program that would reduce vehicle miles traveled (VMT) by approximately 15 percent, and address an additional approximately 6.9 percent of its VMT via a VMT Mitigation Banking Program. Cumulatively, the project would address approximately 21.9 percent of its VMT through TDM Measures and VMT Mitigation Banking Fees (Mitigation Measures TRN-1).
- The project is being designed to be all electric; the project would not tie into natural gas infrastructure. Therefore, the project's building systems (e.g., space heating, water

heating, and heating, ventilation, and air conditioning equipment) and appliances would not consume natural gas.

- Future tenants and operators of the warehouse facility would be required to enroll in 3CE Prime, meaning that all of the warehouse's electricity would be generated from renewable sources of energy (e.g., solar and wind).
- The roof of the proposed warehouse would be constructed to support a solar panel load of up to four pounds per square foot across the entire roof, which would facilitate the installation of an on-site solar photovoltaic system in the future.
- The roof of the project would be constructed of thermoplastic polyolefin (TPO) membrane that has high solar reflectance and low solar energy absorption.
- The proposed project would improve existing pedestrian facilities along the entirety of Ohlone Parkway adjacent to the parking lot by constructing a sidewalk and adding street lighting.
- The proposed project would include approximately 110,585 square feet of landscaped area. The site is generally void of trees; thus, the project would increase the amount of greenspace at the site.

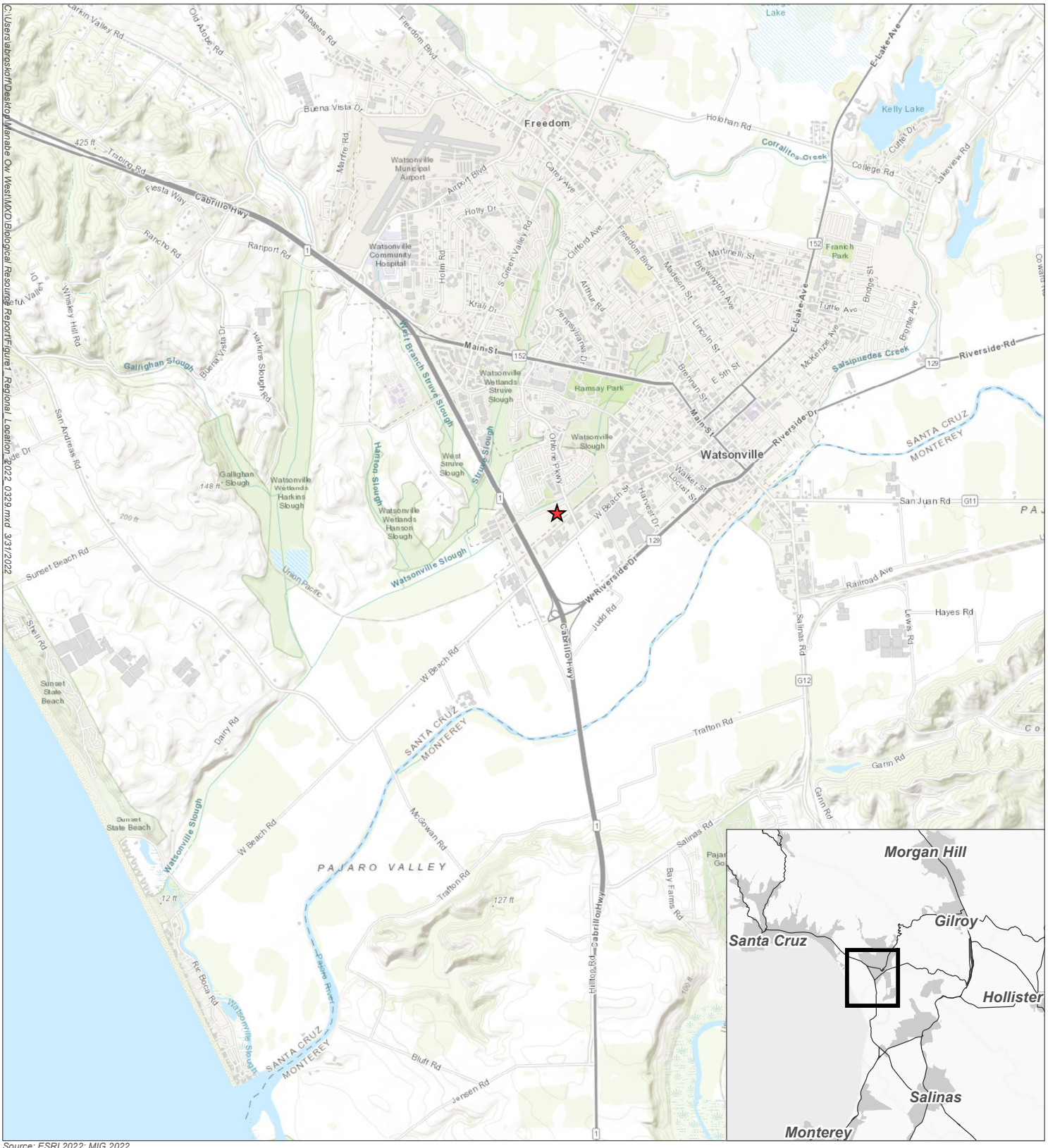


Figure 1 Regional Location Map

100 Manabe Ow Road Industrial Project

Source: Google Earth 9/2021; MIG 2023

Project Site

Stock Pile Area

Access Route

0 0.05 0.1 0.2 Miles

Figure 2 Project Site Location

100 Manabe Ow Road Industrial Project

Photo 1. Viewing southeast across the site from Manabe Ow Road.

Photo 2. Viewing east along the project frontage on Manabe Ow Road.

Source: MIG 7/10/2022

Figure 3 Site Photos 1 and 2

100 Manabe Ow Road Industrial Project

Photo 3. Viewing southwest across the site from Manabe Ow Road.

Photo 4. Viewing west along the project frontage on Manabe Ow Road.

Source: MIG 7/10/2022

Figure 4 Site Photos 3 and 4

100 Manabe Ow Road Industrial Project

Photo 5. Viewing south along Ohlone Parkway from the northeast corner of the site.

Photo 6. Viewing north along the project frontage on Ohlone Parkway from the southeast corner of the site.

Source: MIG 7/10/2022

Figure 5 Site Photos 5 and 6

100 Manabe Ow Road Industrial Project

Photo 7. Viewing west across the site from Ohlone Parkway.

Photo 8. Viewing northwest across the site from the railroad crossing at Ohlone Parkway.

Source: MIG 7/10/2022

Figure 6 Site Photos 7 and 8

100 Manabe Ow Road Industrial Project

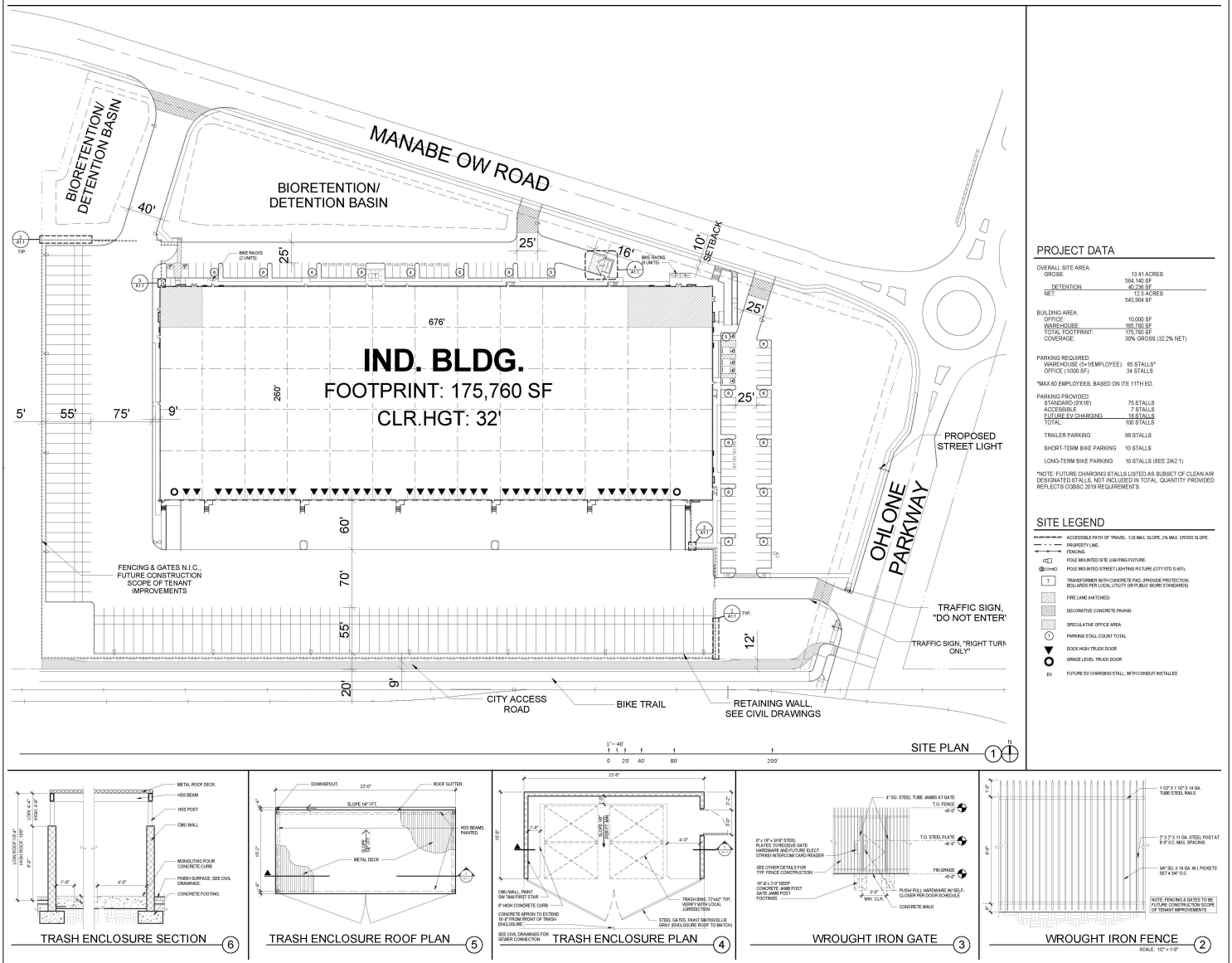
Photo 9. Viewing across the westerly portion of the site.

Photo 10. Viewing west toward Ohlone Parkway from the proposed stockpile site.

Source: MIG 5/1/2023

Figure 7 Site Photos 9 and 10

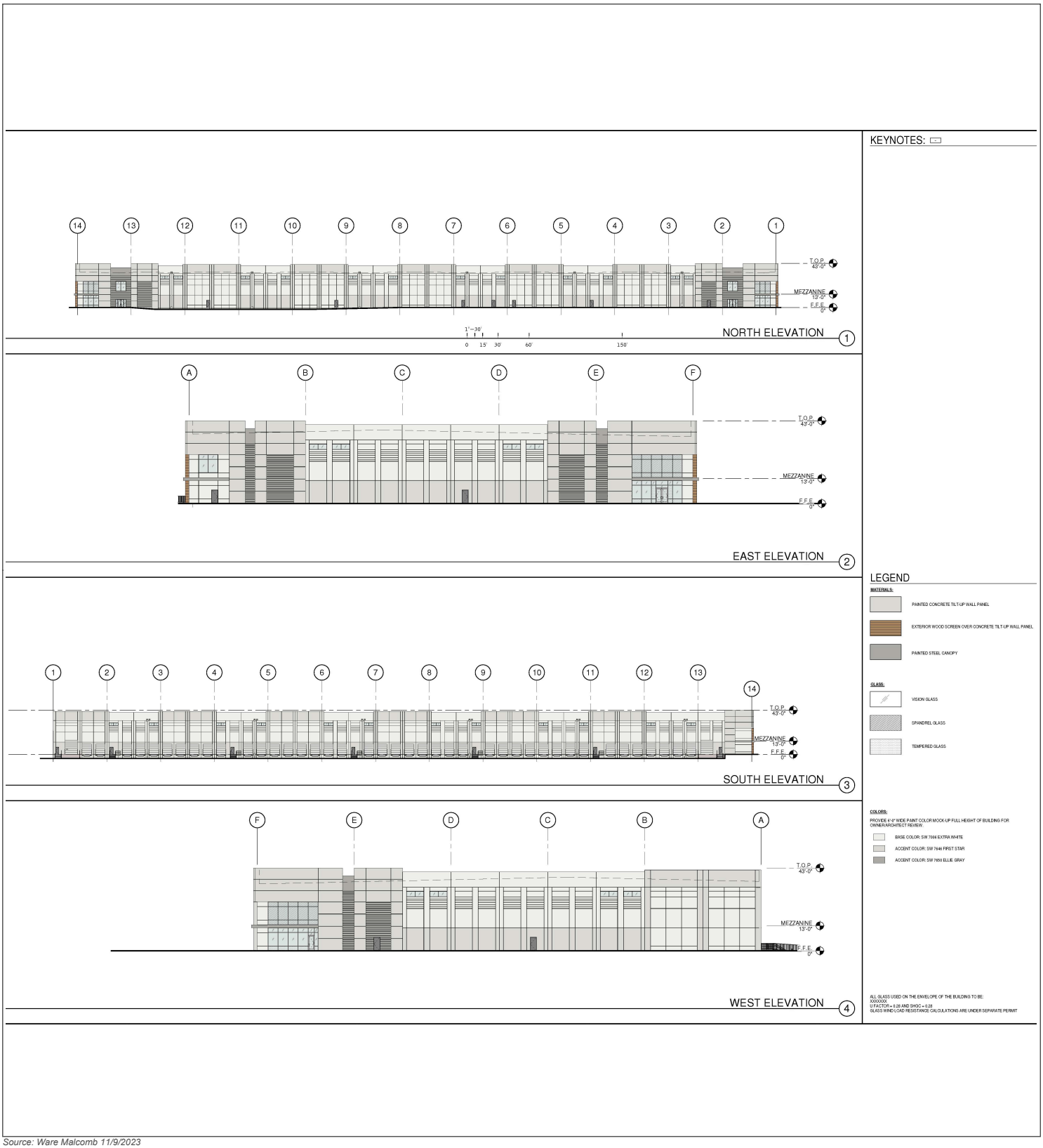
100 Manabe Ow Road Industrial Project



Source: Ware Malcomb 2/14/2023

Figure 8 Site Plan

100 Manabe Ow Road Industrial Project



Source: Ware Malcomb 11/9/2023

Figure 9 Building Elevations

100 Manabe Ow Road Industrial Project

NORTHEAST CORNER VIEW
SCALE: N.T.S. (1)

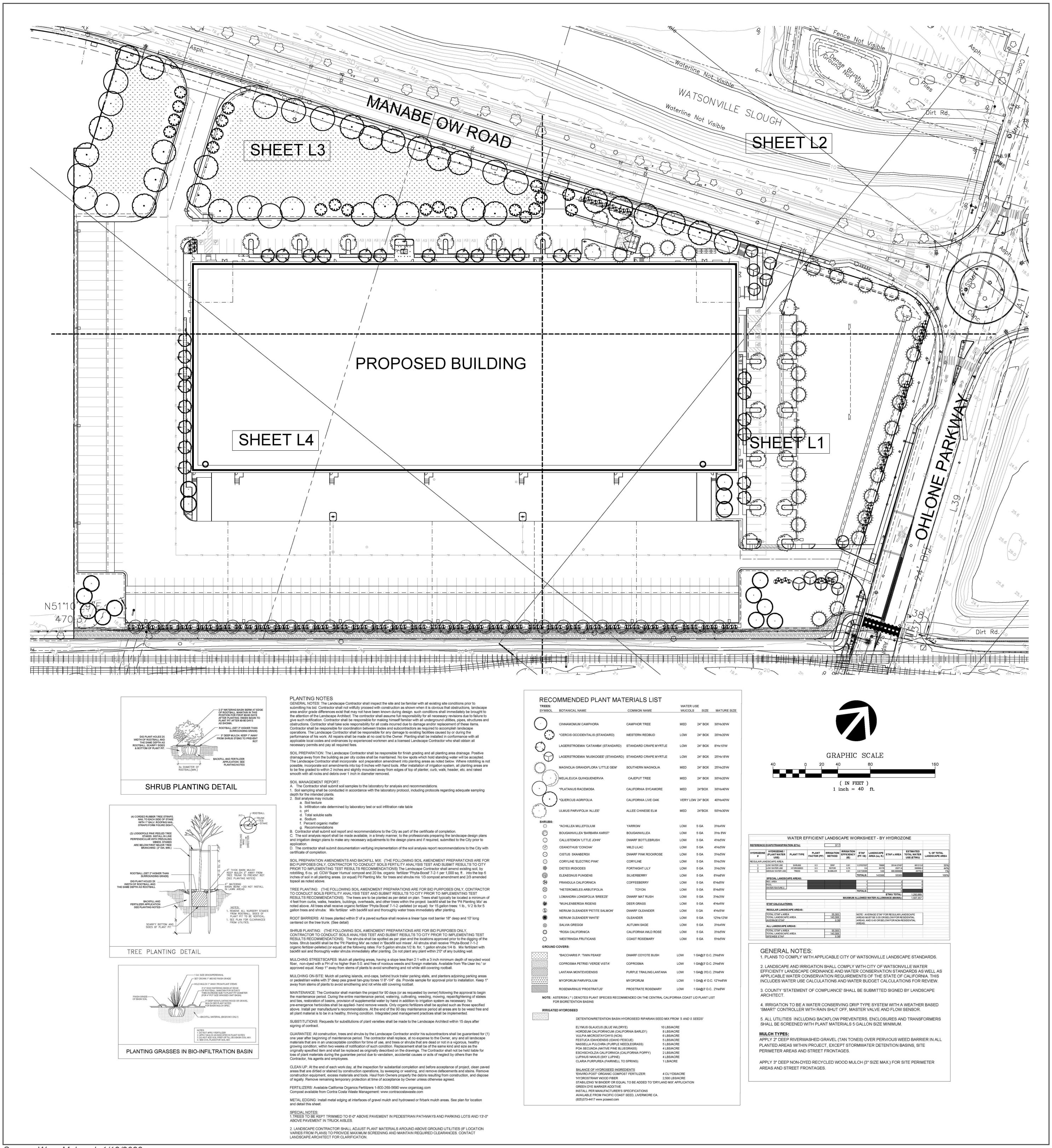
OHLONE PARKWAY DRIVEWAY VIEW
SCALE: N.T.S. (3)

SOUTHEAST CORNER VIEW
SCALE: N.T.S. (2)

Source: Ware Malcomb 1/13/2023

Figure 10 Perspective Views

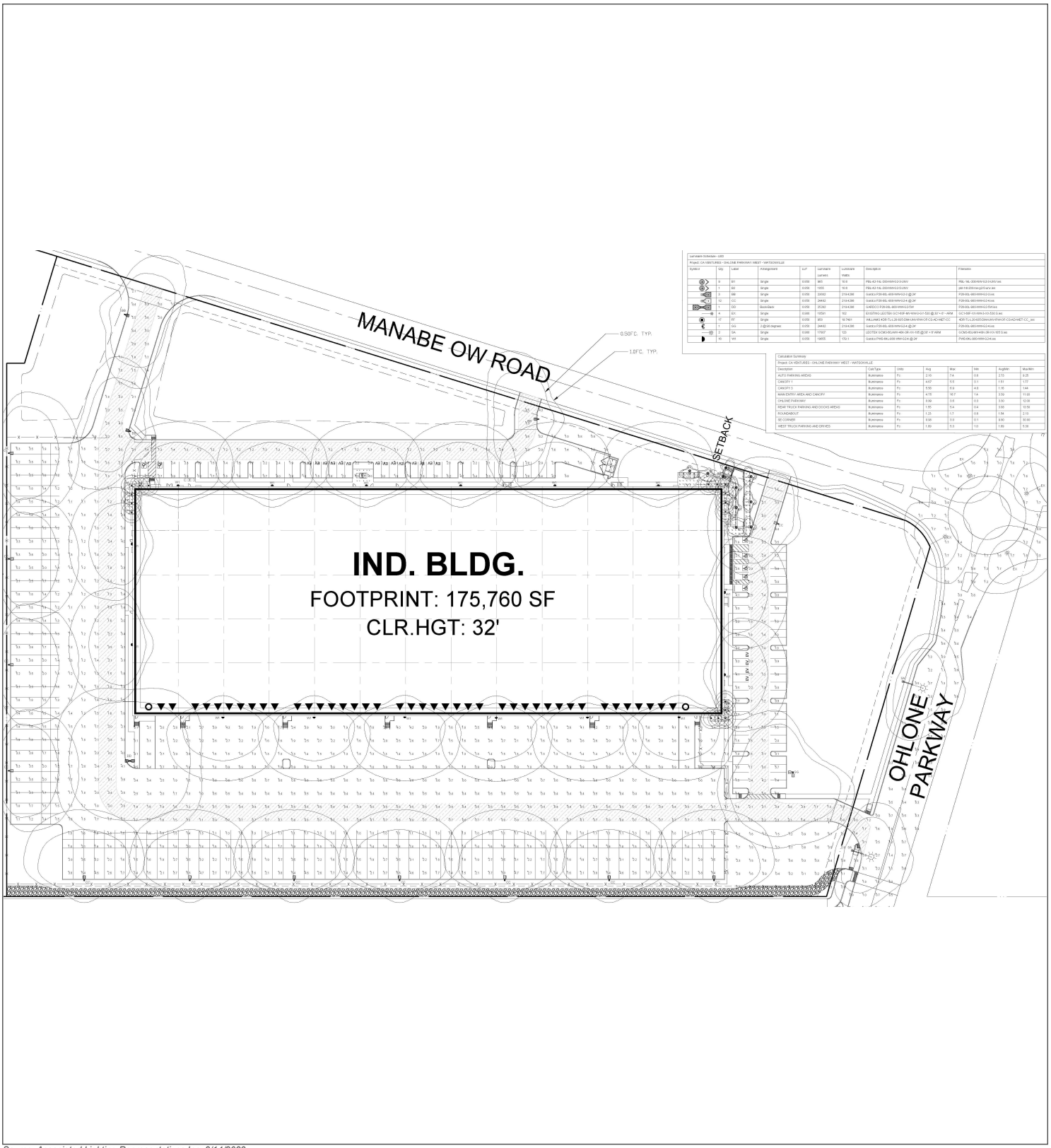
100 Manabe Ow Road Industrial Project



Source: Ware Malcomb 1/13/2023

Figure 11 Conceptual Landscape Plan

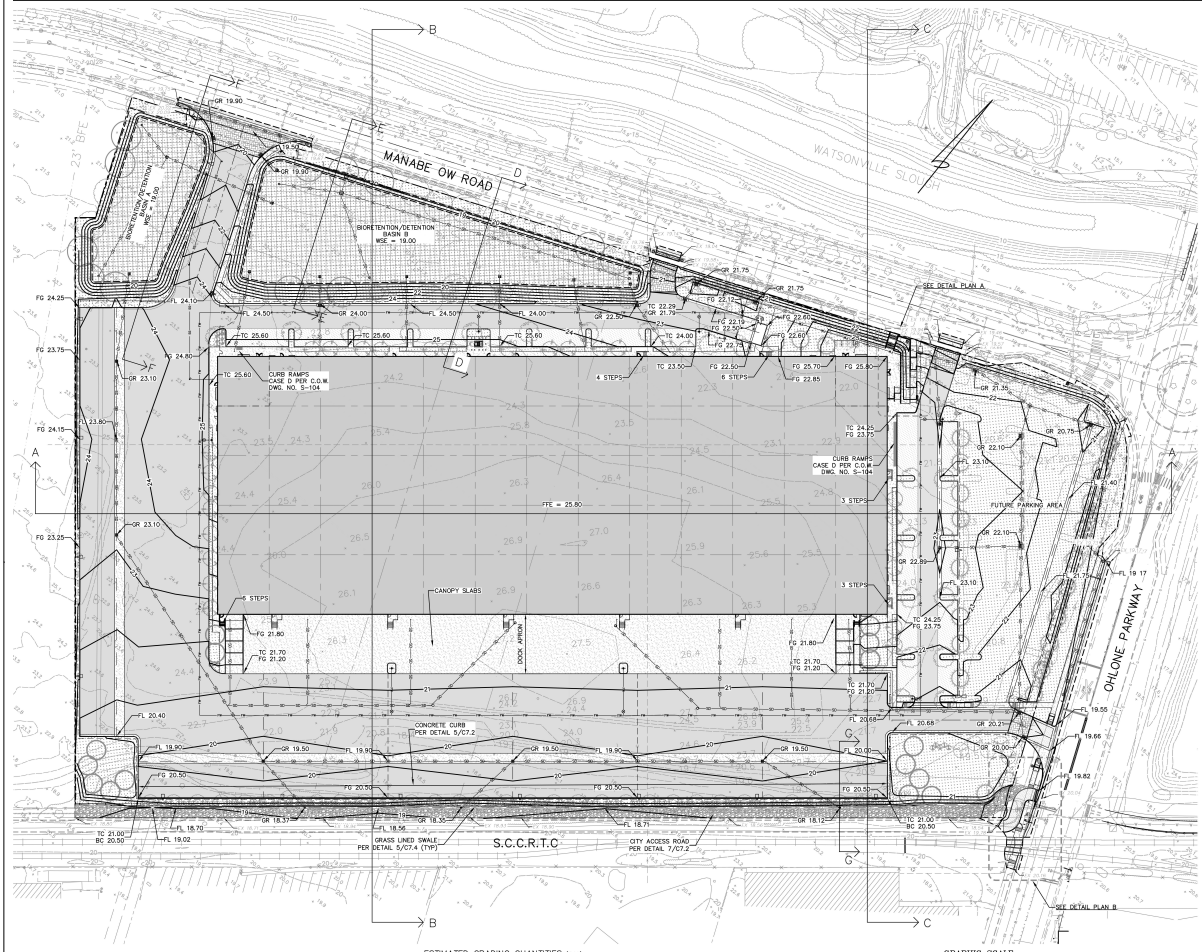
100 Manabe Ow Road Industrial Project

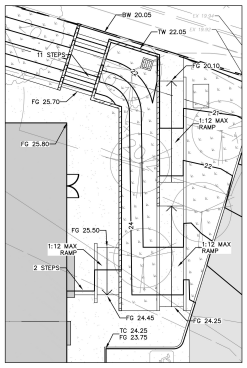


Source: Associated Lighting Representatives Inc. 2/14/2023

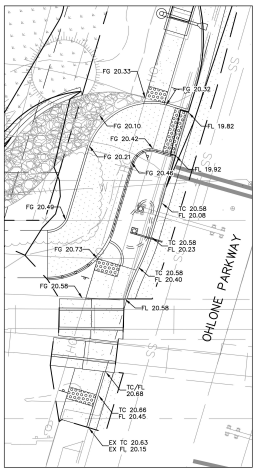
Figure 12 Preliminary Lighting Plan

100 Manabe Ow Road Industrial Project





DETAIL PLAN A
SCALE: 1" = 10'



DETAIL PLAN B
SCALE: 1" = 10'

NOTES:

1. SEE SHEET C7.5 FOR STREET BIO-SWALE DETAILS.
2. SEE SHEET C7.5 FOR ON-SITE BIO-RETENTION DETAILS.
3. SEE SHEET C7.2 FOR RETAINING WALL DETAILS.
4. REFERENCE IS MADE TO THE GEOTECHNICAL INVESTIGATION FOR THE PROPOSED OHLONE PARKWAY INDUSTRIAL FACILITY, OHLONE PARKWAY AND MANABE OW ROAD WATSONVILLE, CA PREPARED FOR CA VENTURES BY CORNERSTONE EARTH GROUP PROJECT NO. 1309-2-1, DATED MAY 5, 2022, FOR SITE CLEARING & PREPARATION, COMPACTION, WET SOIL STABILIZATION, DEWATERING & SHORING REQUIREMENTS
5. THE PAVING AREAS SHALL MEET THE FOLLOWING SLOPE REQUIREMENTS:
   a. DOCK APRONS = MINIMUM OF 1% AND MAXIMUM OF 1.5% (STRAIGHT AWAY FROM BUILDING).
   b. TRUCK AREAS = MINIMUM OF 1% AND MAXIMUM 6%.
   c. CAR AREAS = MINIMUM OF 1% AND MAXIMUM 6% (MUST MEET ALL ADA REQUIREMENTS).
   d. CANOPY SLABS = MINIMUM OF 1% AND MAXIMUM OF 1.5% (STRAIGHT AWAY FROM BUILDING).
   e. ALL SMOOTH CONCRETE HARDSCAPE SURFACES SHALL SLOPE AWAY FROM BUILDINGS A MIN. OF 1% TOWARDS SUITABLE DISCHARGE FACILITIES AND TO PREVENT PONDING. ALL ASPHALT PAVED SURFACES SHALL SLOPE AWAY FROM BUILDINGS A MIN. OF 2% TOWARDS SUITABLE DISCHARGE FACILITIES AND TO PREVENT PONDING
6. ALL GRADED SLOPES SHALL BE 3:1 MAXIMUM.

ESTIMATED GRADING QUANTITIES (C.Y.)

CUT	40,200
FILL	15,700 (15% SHRINKAGE)
EXCESS	24,500

EARTHWORK VOLUMES SHOWN ARE FOR PERMITTING PURPOSES.

ACTUAL EARTHWORK VOLUMES MAY VARY. CONTRACTOR SHALL VERIFY THE EARTHWORK VOLUMES TO HIS SATISFACTION PRIOR TO CONSTRUCTION.

FINISH GRADE TO SUB GRADE THICKNESSES ARE AS DESCRIBED ON SHEET C2.1. FOR THE BUILDING WE ASSUMED 12" THICK FROM SUBGRADE TO FINISH FLOOR.

GRAPHIC SCALE
(IN FEET)
1 inch = 40 ft.

Source: Ware Malcomb 1/13/2023

Figure 13 Preliminary Grading Plan

100 Manabe Ow Road Industrial Project

2.5 STANDARD DESIGN AND CONSTRUCTION MEASURES

The proposed project would be implemented consistent with all relevant federal, state, regional, and local regulations aimed at preventing or reducing environmental impacts. Table 2.5-1 lists the Standard Designs and Construction Measures that have been incorporated into the planning, design, construction, operation, and maintenance of the proposed project to minimize the potential adverse effects of the project on the surrounding community and the environment. These Standard Design and Construction Measures will be included in project construction drawings and/or specifications and as such are considered a part of the project and are not considered mitigation measures.

Table 2.5-1: Standard Design and Construction Measures

Impact Section	*Std. Design & Construction Measure*	*Applicable Regulatory Requirement*
Air Quality	**Construction Fugitive Dust and Exhaust Emissions Best Management Practices:** The City shall require the applicant to incorporate the following construction air quality best management practices into all applicable project bid, design, and engineering documents: 1) All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) shall be watered at least twice per day, at a minimum. 2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. 4) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 5) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.	**BAAQMD CEQA Guidelines**

	6) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 7) All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) shall be watered at least twice per day, at a minimum. 8) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 9) All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 10) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. 11) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 12) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 13) All trucks and equipment, including their tires, shall be washed off prior to leaving the site. 14) Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. 15) Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. 16) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.	

	17) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 18) Stage construction equipment and materials as far away as possible from residential land uses to the extent feasible.	
Geology/ Paleontological Resources	**Paleontological Resources**: The following measures shall be applied to development of the project site to reduce and/or avoid impacts to paleontological resources: If vertebrate fossils or other paleontological resources are discovered during construction, all work shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The City of Watsonville's Project Manager or other suitable representative shall be responsible for submitting the paleontologist's report to the Director of Public Works and implementing the recommendations of the qualified professional paleontologist. The representative shall submit a report to the Director of Public Works indicating how the paleontologist's recommendations were complied with as soon as all measures have been incorporated into the project.	**Paleontological Resources Preservation Act**
Hydrology/Water Quality	**Phase 1 and Phase 2 Preliminary Stormwater Pollution Prevention Plans**. The project includes preliminary stormwater pollution prevention plans to prevent erosion and protect water quality during construction. The plans include best management practices including, but not limited to, the use of hydraulic much, geotextiles, plastic covers, erosion control blankets, earth dikes, drainage swales, lined ditches, silt fences, sediment traps, fiber rolls, street sweeping, wind erosion control, vehicle and equipment cleaning, fueling, and maintenance, stockpile, solid, and hazardous waste management. Project plans also include the City of Watsonville's Erosion Control	**California General Permit For Stormwater Discharges associated with Construction Activity (Construction General Permit)** **Central Coast Regional Water**

	Standards plan sheets which are required during the rainy season (October 16- April 15). **General Permit for Construction Activity.** The project disturbs more than one acre of land and therefore requires compliance with the requirements of the California General Permit For Stormwater Discharges associated with Construction Activity (Construction General Permit). The Construction General Permit requires the filing of a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) during construction. In order to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) program for construction, construction contractors shall install and maintain appropriate BMPs, as shown in the erosion control plans and in accordance with the SWPPP, on all construction projects. BMPs shall be installed in accordance with industry recommended standards, and/or in accordance with the Construction General Permit issued by the state. sediment, construction materials, debris and wastes, and other pollutants must be retained on site and may not be transported from the site via sheet flow, swales, area drains, natural drainage courses, wind, or vehicle tracking to the extent feasible. Under direction of the Contractor's qualified SWPPP practitioner (QSP), erosion and/or sediment control devices shall be modified as needed as the project progresses to ensure effectiveness. The contractor shall download and keep a copy of the SWPPP on site and available for review throughout the entire construction period.	**Quality Control Board (City of Watsonville Public Improvement Standards - Stormwater Post Construction Standards)**
Noise	**Construction Noise Control BMPs:** To reduce potential construction noise levels from project construction activities, the City shall require the applicant: • Restrict Work Hours: All construction-related work activities, including deliveries, shall follow more restrictive noise measures than those required in Watsonville Municipal Code.	**Watsonville Municipal Code (WMC), Title 5, Public Welfare, Morals, and Conduct, Chapter 8, Noise** **Santa Cruz County code is**

	• Construction activities shall not take place between the hours of 7:00 PM and 7:00 AM on weekdays, nor prior to 8:00 AM or after 5:00 PM on Saturday. No work shall occur on Sundays or holidays. • A sign shall be posted at a conspicuous location near the main entry to the site, prominently displaying these hour restrictions and identifying the phone number of the job superintendent. • Control Construction Traffic and Site Access. Construction traffic, including soil and debris hauling, shall follow City-designated truck routes and shall avoid routes that contain residential dwelling units to the maximum extent feasible given specific Project location and access needs. • Construction Equipment Selection, Use, and Noise Control Measures. The following measures shall apply to Project construction equipment: ▪ Contractors shall use the smallest size equipment capable of safely completing necessary work activities. ▪ Construction staging shall occur as far away from residential and other noise-sensitive land uses as possible. ▪ All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be shielded and located as far from noise-sensitive land uses as practical. Shielding may consist of structures or three- or four-sided enclosures provided the structure/enclosure breaks the line of sight between the equipment and the noise-sensitive land use and provides for proper ventilation and equipment operation. ▪ Heavy equipment engines shall be equipped with standard noise suppression	**used. The County of Santa Cruz enforces noise standards through County Code Chapter 8.30, Noise.**

	devices such as mufflers, engine covers, and engine/mechanical isolators, mounts, etc. Equipment shall be maintained in accordance with manufacturer's recommendations during active construction activities. ▪ Pneumatic tools shall include a noise suppression device on the compressed air exhaust. ▪ The Project shall connect to existing electrical service at the site to avoid the use of stationary power generators (if technically, logistically, and economically feasible and approved by the electric service provider). ▪ No radios or other amplified sound devices shall be audible beyond the Project property line. ▪ Prepare a Construction Noise Complaint Plan. The Construction Noise Complaint Plan shall: a. Identify the name and/or title and contact information (including phone number and email) for a designated Project and City representative responsible for addressing construction-related noise issues. The Project representative shall be the property owner or construction job superintendent. The City representative shall be the City Engineer or designee. b. Include procedures describing how the designated Project representative will receive, respond, and resolve construction noise complaints. At a minimum, upon receipt of a noise complaint, the Project representative shall notify the City contact, identify the noise source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint.	

2.6 CITY ACTIONS/ APPROVAL

As proposed, the following would be required for approval of the project:

- Design Review – City of Watsonville Planning Commission
- Special Use Permit – City of Watsonville Planning Commission

The proposed warehouse use is permitted in the Manabe-Ow Business Park Specific Plan Business Park designation, however, the Specific Plan requires that a Special Use Permit be obtained for any proposed use that has the potential to generate significant impacts, such as noise. In addition, any warehousing exceeding 30% of the floor area of a business requires a Special Use Permit. Since warehousing will exceed 30% of the floor area of the proposed business, a Special Use Permit is required. The Watsonville Zoning Ordinance requires a Design Review by the Planning Commission for new construction.

2.7 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐	Aesthetics	☐	Greenhouse Gas Emissions	☐	Public Services
☐	Agricultural and Forestry Resources	☐	Hazards and Hazardous Materials	☐	Recreation
☐	Air Quality	☐	Hydrology/Water Quality	☒	Transportation
☒	Biological Resources	☐	Land Use/Planning	☒	Tribal Cultural Resources
☒	Cultural Resources	☐	Mineral Resources	☐	Utilities/Service Systems
☐	Energy	☐	Noise	☐	Wildfire
☐	Geology/Soils	☐	Population/Housing	☒	Mandatory Findings of Significance

2.8 SUMMARY OF FINDINGS: IMPACTS AND MITIGATIONS

Impact findings and mitigation measures identified in this Initial Study checklist and narrative are summarized below. The mitigations listed below represent conditions of approval for the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project.

Aesthetics

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

Agricultural and Forestry Resources

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

Air Quality

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

Biological Resources

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

Mitigation Measure BIO-1a. Conduct Preconstruction Survey. No more than 24 hours prior to the date of initial ground disturbance, a pre-construction survey for California red-legged frog and western pond turtle will be conducted within the impact area by a qualified biologist. The survey will consist of walking the limits of impact to ascertain the possible presence of the species. The qualified biologist will investigate all potential areas that could be used by California red-legged frog and western pond turtle for feeding, sheltering, movement, and other essential behaviors.

A qualified biologist is an individual who shall have a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for each amphibian and reptile special-status species that may be present within the project areas. During or following academic training, the qualified biologist shall have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements. Additionally, the qualified biologist must be permitted or authorized to handle and relocate California red-legged frog and western pond turtle.

Mitigation Measure BIO-1b. Worker Environmental Awareness Program. All construction personnel will participate in a worker environmental awareness program. These personnel will be informed about the possible presence of all special-status species and habitats associated with the species identified here to be potentially present in the parcel and that unlawful take of the animal or destruction of its habitat is a violation of law. Prior to construction activities, a qualified biologist will instruct all construction personnel about (1) the description and status of the species; (2) the importance of their associated habitats; (3) a list of measures being taken to reduce impacts on these species during project construction and implementation; and (4) measures to be followed if special-status species are encountered during construction activities. A fact sheet

conveying this information will be prepared for distribution to the construction crew and anyone else who enters the project site.

Mitigation Measure BIO-1c. Install Wildlife Exclusion Barrier. Prior to any ground disturbance in the work area, a temporary wildlife exclusion barrier will be installed along the limits of disturbance. A qualified biologist will inspect the area prior to installation of the barrier. The barrier will be designed to allow the California red-legged frog and western pond turtle to leave the work area and prevent them from entering the work area. The fence will remain in place until all development activities have been completed. This barrier will be inspected daily and maintained and repaired as necessary to ensure that it is functional and is not a hazard to California red-legged frogs on the outer side of the barrier.

Mitigation Measure BIO-1d. Vegetation Removal. All vegetation within the work area will be cut to four inches in height by a high-wheel mower or weed-whip just prior to the initiation of grading to remove cover that might be used by California red-legged frogs and/or western pond turtles. A qualified biologist authorized to handle California red-legged frogs and/or western pond turtles will walk with the mower/whip to monitor for species during the vegetation removal.

Mitigation Measure BIO-1e. Construction Monitoring. A qualified biologist or biological monitor will be onsite during all project activities that may result in take of any special-status species. The qualified biologist will be given the authority to freely communicate verbally, telephone, electronic mail, or in writing at any time with construction personnel, any other person(s) at the project site, otherwise associated with the project, and regulatory agencies (e.g., USFWS or CDFW). The qualified biologist or biological monitor will have oversight over implementation of all the mitigation measures and will have the authority and responsibility to stop project activities if they determine any of the measures are not being fulfilled.

A biological monitor is an individual who shall have academic and professional experience in biological sciences and related resource management activities as it pertains to this project, experience with construction-level biological monitoring, be able to recognize species that may be present within the project area and be familiar with the habits and behavior of those species.

Mitigation Measure BIO-1f. Relocation of California Red-legged Frog and Western Pond Turtle. If a red-legged frog or western pond turtle is found during project activities, work will stop until a qualified biologist that is permitted to handle California red-legged frog or authorized to handle western pond turtle relocates the animal from the impact area before groundwork starts again. Only a qualified biologist will capture, handle, and move California red-legged frog and western pond turtle. The qualified biologist will monitor any relocated frog or turtle until it is determined that it is not imperiled by predators or other dangers. See Mitigation Measure BIO-2a for the definition of a qualified biologist.

Mitigation Measure BIO-1g. Daytime Restriction. No work will be performed during nighttime hours. If construction is necessary at dawn or dusk, lights will be directed away from Watsonville Slough and the Cattail Marsh habitats.

Mitigation Measure BIO-1h. Food and Trash. To eliminate an attraction for the predators of the California red-legged frog and western pond turtle, all food-related trash items such as wrappers, cans, bottles, and food scraps will be disposed of in solid, closed containers (trash cans) and

removed at the end of each working day from the entire construction site. Dogs or other pets will not be allowed on site during construction.

Mitigation Measure BIO-1i. Steep-walled Holes and Trenches. To prevent inadvertent entrapment of the California red-legged frog or western pond turtle, a qualified biologist, biological monitor, and/or construction foreman/manager will ensure that all excavated, steep-walled holes or trenches more than one foot deep are completely covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth fill or wooden planks and inspected by a qualified biologist. Before such holes or trenches are filled, they will be thoroughly inspected for trapped animals by a qualified biologist and/or construction foreman/manager. If at any time a trapped California red-legged frog or western pond turtle is discovered by a qualified biologist or anyone else, the steps in Mitigation Measure BIO-2f Relocation of California red-legged frog and Western Pond Turtle will be followed.

Mitigation Measure BIO-1j. Prohibition of Plastic Mono-filament Netting. To prevent trapping California red-legged frogs or other species at the project site, erosion control materials containing plastic mono-filament netting or similar material will not be used, even if it is labeled as biodegradable. Acceptable substitutes include coconut coir matting, straw/coconut finer erosion blanket, straw wattles wrapped in burlap, coir logs, and/or tackifier.

Mitigation Measure BIO-2a. Focused Surveys for the Crotch Bumble Bee. Within one year of Project initiation, a qualified biologist shall conduct a focused survey for the Project site and stockpile area. These surveys shall be conducted during the flight season (March - September), timed to occur when detection probability is highest, including surveys in early spring (early April) and early summer (early July). Focused surveys shall be conducted during four evenly spaced sampling periods during the flight season. Surveys shall be conducted by a qualified biologist with knowledge of the life history and ecology of special-status bumble bees. Reference sites shall be visited to confirm bumble bee activity as flight periods may vary geographically and with weather. Surveys shall be conducted within the project site, stockpile area, and accessible adjacent areas with suitable habitat. Survey results shall be documented and will be submitted to the City, if requested. At a minimum, a survey report shall provide the following:

1. A description and map of the survey area, focusing on areas that could provide suitable habitat for the Crotch bumble bee;

2. The name(s) of qualified biologist(s) and their qualifications, date and time of the survey, survey duration, general weather conditions, and survey methodology.

3. Figure showing the locations of nest/colonies; and,

4. A description of the physical (e.g., soil type, moisture, slope aspect) and biological conditions (e.g., dominant plant species) where each nest/colony was detected.

5. A description of primarily impacted habitat, including plant composition (e.g., density, cover, and abundance) within the impacted habitat (e.g., species list separated by vegetation class, density, cover, and abundance of each species).

If the project site or stockpile area is not occupied by the Crotch bumble bee, no additional actions are warranted. However, if there are any delays in project scheduling greater than one year following the focused surveys, the surveys shall be repeated.

If the crotch bumble bee is found to occupy the project site or stockpile area, Mitigation Measures BIO-1b above (Worker Environmental Awareness Program) shall be implemented.

Mitigation Measure BIO-2b. Regulatory Agency Consultation. If a qualified biologist determines that the Crotch bumble bee is present on the Project site or stockpile area, and if "take" or adverse impacts to the bumble bee cannot be avoided, the CDFW shall be consulted to determine if a CESA Section 2080 Incidental Take Permit is required. If an Incidental Take Permit is required, the project shall comply with the requirements of the ITP. Typical requirements of an ITP include compensatory mitigation for the loss of habitat, and a Habitat Mitigation and Monitoring Plan to ensure that conservation lands are functioning properly. Typical requirements of an HMMP include a planting plan and associated success criteria, and long-term monitoring of the habitat.

Mitigation Measure BIO-3: Pre-Construction/Pre-Disturbance Survey for Nesting Birds.

Avoidance. To the extent feasible, construction activities, including soil stockpiling, should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in Santa Cruz County extends from February 1 through September 15.

Pre-Construction Surveys. To avoid impacts to nesting birds and violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (that is, prior to February 1 or after September 15). If construction and construction noise occur within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance, including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests. The surveys shall be conducted by a qualified biologist no more than five (5) days before commencement of any vegetation trimming, site disturbance activities and/or equipment mobilization. If project activities are delayed by more than 5 days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented.

If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and/or mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, grading, and soil stockpiling), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, unless smaller buffers are determined to be appropriate by a qualified biologist. If work is required within the aforementioned buffers, the qualified biologist will assess the level of disturbance from the planned work and determine if a smaller buffer is warranted (e.g., installation of sheet pile with an impact hammer would not warrant a smaller buffer, but minor grading and excavation may

warrant a smaller buffer). If the qualified biologist determines that a smaller buffer is warranted, then the planned work may proceed. The qualified biologist will observe the behavior of the nesting bird(s) and/or chicks during the onset of the planned work and if the nesting bird(s) and/or chicks do not show signs of distress then work may resume within the smaller buffer. If the nesting bird(s) and/or chicks show signs of distress, then the planned work will cease within the smaller buffer and work may resume within the original buffer established. The buffer shall remain in place until the chicks have fledged. Monitoring by a qualified biologist will ensure compliance with MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented and submitted to the project's Principal Planner at the Community Development Department for internal record-keeping.

Mitigation Measure BIO-4: Standards for Bird Safe Buildings. The project shall implement the following bird-safe design considerations:

- Use glazing or window coatings/markings that reduce bird strike hazard caused by transparency, reflectance, black hole, or passage effect, etc., such as Guardian Bird1st etch glass or similar. See recommendations by the American Bird Conservatory at https://abcbirds.org/glass-collisions/

- Minimize plants or landscaped areas behind glass.

- Minimize concentrations of plantings adjacent to glass facades.

Cultural Resources

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

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

Mitigation Measure CUL-2: Conduct Archaeological and Native American Monitoring During Ground Disturbing Phases of Construction. Ground-disturbing activities beyond surface level soils shall be observed by a qualified archaeological monitor either meeting the Secretary of the Interior's Professional Qualifications Standards, or under the direction of an

archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards. Monitoring activities shall also include a Native American monitor for tribal cultural resources. If archaeological resources are encountered Mitigation Measure CUL-3 will apply. Archaeological monitoring may be reduced or halted at the discretion of the monitor as warranted by conditions such as encountering bedrock, ground disturbance is occurring in fill, or other indications that discovery is extremely unlikely. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location within the project site and when ground disturbance will extend to depths not previously reached, unless those depths are within bedrock.

Mitigation Measure CUL-3: Discovery of cultural, historic, or archaeological resources during construction. The project applicant shall ensure that if any previously undisturbed cultural, historic, or archaeological resources are uncovered in the course of site preparation, clearing or grading activities that the City of Watsonville Community Development Director is notified and operations within 25 feet of the discovery are halted until such time as a qualified professional archaeologist can be consulted to evaluate the find and recommend appropriate action for collection, recordation, analysis, and reporting. If the find is determined to be significant, a Cultural Resources Treatment Plan shall be developed by a qualified archaeologist. The Treatment Plan shall reflect details pertaining to the depths and locations of excavation activities. The Treatment Plan shall be subject to review and approval by the City of Watsonville Community Development Department prior to any further ground disturbing activities being required. The Treatment Plan shall contain:

- Identification of the found resources;
- Treatment and curation steps for the found resources;
- Detailed field strategy to record, recover, or avoid the finds, and additional mitigation to protect further anticipated resources;
- A data recovery plan, which may include archaeological excavation, such as test pits, hand excavation, or auguring;
- Provisions for producing an archaeological report to be sent to the Northwest Information Center detailing the results of the archaeological discovery, and subsequent treatment and results;
- Any historic or prehistoric material identified in the project area during earth-disturbing activities shall be evaluated for eligibility for listing as a candidate City Landmark and/or in the California Register of Historic Resources. Data recovery methods may include, but are not limited to backhoe trenching, shovel test units, hand auguring and hand-excavation.
- Final Reporting: Once all analyses and studies required by the project-specific Cultural Resources Treatment Plan have been completed, the project applicant, or representative, shall prepare a final report summarizing the results of the field investigation, data recovery activities and results, and compliance with the Cultural Resources Treatment Plan during all demolition, grading, building, and other construction activities. The report shall document the results of field and laboratory investigations and shall meet the Secretary of the Interior's Standards for Archaeological Documentation. The contents of the report shall be consistent with the protocol included in the project-specific Cultural Resources Treatment Plan. The report shall be submitted to the City of Watsonville Community Development Department Director for review and approval prior to issuance of any

Certificates of Occupancy (temporary or final). Once approved, the final documentation shall be submitted to the Northwest Information Center at Sonoma State University, as appropriate.

- Curation: Upon completion of the final report required by the project-specific Cultural Resources Treatment Plan, all recovered archaeological materials not identified as tribal cultural resources by the Native American monitor, shall be transferred to a long-term curation facility. Any curation facility used shall meet the standards outlined in the National Park Services' Curation of Federally Owned and Administered Archaeological Collections (36 CFR 79). The project applicant shall notify the Supervising Planner of the City of Watsonville Community Development Department. Enforcement of the selected curation facility prior to the issuance of any Certificates of Occupancy (temporary or final). To the extent feasible, and in consultation with the Native American representative, all recovered Native American/tribal cultural resources and artifacts shall be reburied on-site in an area that is unlikely to be disturbed again. Treatment of materials to be curated shall be consistent with the protocols included in the project-specific Cultural Resources Treatment Plan.
- All archaeological materials recovered during the data recovery efforts shall be cleaned, sorted, catalogued, and analyzed following standard archaeological procedures, and shall be documented in a report submitted to the Community Development Department Director and the NWIC.

Mitigation Measure CUL-4: Inadvertent Discovery of Human Remains If human remains of Native American origin are discovered during ground disturbing activities, the project applicant shall comply with state laws relating to the dispositions of Native American burials, which falls within the jurisdiction of the California Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097.98). If human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the planning area or any nearby area reasonably suspected to overlie adjacent human remains until:

- The Santa Cruz County Sherriff-Coroner has been informed and has determined that no investigation of the cause of death is required, and
- If the remains are of Native American origin:
    - The descendants from the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave good as provided in the Public Resources Code, Section 5097.98, or
    - The California NAHC was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the NAHC.

Energy

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

Geology and Soils

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

Greenhouse Gas Emissions

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

Hazards and Hazardous Materials

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

Hydrology and Water Quality

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

Land Use and Planning

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

Mineral Resources

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

Noise

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

Population and Housing

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

Public Services

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

Recreation

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

Transportation

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

Mitigation Measure TRN-1a. Implementation of a TDM Program. Prior to the commencement of any operations on the project site, the project applicant shall develop and submit, to the

satisfaction of the Community Development Director, a TDM Program that includes the following TDM measures to reduce vehicle trips by employees of the project by 15 percent:

1. Travel Behavior Change Program
2. Preferential Carpool Parking Spaces
3. Telecommuting
4. Alternative Work Schedule
5. Bike Share
6. Bicycle Parking in Excess of Code and Showers/Changing Rooms
7. Pedestrian Network Improvements

The project applicant shall submit compliance reports describing the implementation status of each of the seven TDM measures to the Community Development Director on an annual basis for five years following project approval (through 2028). Reports shall be due by the end of March.

Mitigation Measure TRN-1b. Payment Into a VMT Mitigation Banking Program. Prior to the commencement of any operations on the project site, the project applicant shall participate in the Watsonville VMT Mitigation Banking Fee Program by paying the established In-Lieu Fee to Reduce VMT Associated with Development Projects in effect at the time of participation in the Program. The Program currently calculates the cost per VMT reduction as $1,524.21. Therefore, to achieve the 6.9 percent VMT reduction needed after implementation of the TDM program, the project would be responsible for paying $91,452.60 based on the current fee structure (VMT Banking Fee = 60 employees x 1.0 VMT per employee x $1,524.21 per VMT). This is calculated as 6.9 percent being equivalent to a 1.0 VMT per employee reduction.

Tribal Cultural Resources

The following mitigation measure would ensure impacts are less than significant.

Mitigation Measure TRI-1: Consider all Native American Archaeological Discoveries to be Significant Resources. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 until the lead agency has enough evidence to make a determination of significance. The City shall coordinate with an archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications, as well as an appropriate tribe or tribes, as determined by the NAHC, to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.

Utilities and Service Systems

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

Wildfire

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

2.9 DETERMNATION

On the basis of this initial evaluation:

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

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

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

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

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

05/23/2023

Signature Date

Matthew Orbach Principal Planner

Printed Name Title

Chapter 3. Environmental Checklist and Responses

1. **Project Title:** 100 Manabe Ow Road Industrial Project

2. **Lead Agency Name and Address:**

   City of Watsonville
   Community Development Department
   Planning Division
   250 Main Street
   Watsonville, California 95076

3. **Contact Person and Phone Number:**

   Matt Orbach, Principal Planner
   City of Watsonville Community Development Department
   Planning Division
   250 Main Street
   Watsonville, CA 95076
   (831) 768-3050; Direct: (831) 768-3075
   matt.orbach@cityofwatsonville.org

4. **Project Location:** 100 Manabe Ow Road, Watsonville, CA 95076

5. **Project Sponsor's Name and Address:**

   CA Ventures
   2303 Main Street, Suite 1300
   Irvine, CA 92614

6. **General Plan Designation:** Industrial

7. **Zoning:** Industrial Park (IP)

8. **Description of the Project:** The project proposes to construct a rectangular shaped one-story industrial warehouse structure totaling 175,760 square feet, which includes 10,000 square feet of office space with 5,000 square feet being located on an interior mezzanine level. The Manabe Ow Road frontage area would be landscaped and includes two stormwater retention/detention basins totaling 39,991 square feet in area. The proposed building would have a 32-foot interior clearance and have a 43-foot exterior height and has space for 41 truck docks, located at the rear of the building. The project includes a Condition of Approval that only allows nine (9) dock packages (the kits containing the doors that allow the docks to be utilized) to be installed with the initial construction of the building. Additional dock packages may be added as a tenant improvement for the future building tenant(s), however, the Condition of Approval also states that any future proposal to use additional dock doors shall require a Major Revision to the Special Use Permit (or applicable discretionary permit required for such modifications) and subsequent CEQA review. The future tenant of the building is speculative at this time, but future uses could include warehousing/storage for dry goods, truck trailer/container storage, or other uses permitted by the Manabe-Ow Business Park Specific Plan. The Specific Plan states that light industrial uses are permitted within the Business Park District and warehouses exceeding 30 percent of the floor area of a business require a Special Use Permit. Accordingly, the project would be subject to the approval of a Design Review and a Tier Two Special Use Permit by the

Planning Commission. There would be no further entitlements required for the project prior to grading/building permit issuance. The building renderings and 3D modeling are shown on Figure 9 and Figure 10.

For the purpose of this analysis, MIG assumed that the proposed warehouse would operate as a distribution facility that operates 24 hours per day, Monday through Sunday (7-days per week), and have 60 employees*.*

Surrounding Land Uses and Setting: The vacant site is located within a planned business park (Manabe Ow Business Park Specific Plan) and is bordered on the north by Manabe Ow Road and the Watsonville Slough. An unpaved pedestrian/bike trail runs along the northern edge of the slough. Beyond the slough to the north is an existing single-family residential neighborhood, and a FedEx distribution warehouse is located adjacent to the west side of the subdivision. To the east of the project site across Ohlone Parkway is additional vacant land within the business park boundaries that extends eastward between Watsonville Slough and the railroad right-of-way for approximately 1/3-mile. To the west of the project site are 11.5 acres of vacant land with an active project application for construction of a 155,847-square-foot warehouse/distribution facility. There is a planned trail in the railway corridor and there are various existing industrial and distribution warehouse uses located south of the railroad right-of-way, including a food distribution center, lumber store, scrap metal business, and packaging companies.

9. **Other public agencies whose approval is required:** None.

10. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** No California Native American tribes have requested consultation with the City pursuant to PRC section 21080.3.1 (AB 52).

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:

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

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

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

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

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

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

9. The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
*Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
*Except as provided in Public Resources Code Section 21099				

3.1.1 Environmental Setting

The City of Watsonville is located in the Pajaro Valley in the southernmost portion of Santa Cruz County approximately 47 miles south of the City of San José. Neighboring communities within 25 miles of the planning area include the following: the City of Santa Cruz and City of Capitola which are each respectively located 20 miles and 14 miles north of the planning area and the community of Castroville and the City of Salinas which are each respectively located approximately 11 miles to the southwest and 23 miles to the southeast. The City of Scotts Valley is located approximately 21 miles to the northwest.

The City of Watsonville 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 lend a distinct rural character to an urban viewshed in the central core.

The City's western edge is defined by Highway 1 and agricultural land that extends to Monterey Bay. Landscape features within and surrounding the City are diverse, exhibiting substantial visual variety. Representative visual features include the overall urban landscape, major arterial thoroughfares, scenic corridors, agricultural lands, open space, and ridgelines.

The project site was formerly used for agricultural uses. On December 15, 2015, the City of Watsonville Public Works Department issued Excavation & Grading Permit #EG2015-6 for the placement of up to 145,000 cubic yards (CU) of engineered fill on the West Ohlone parcels (APN: 018-711-5, 25, & 26) including the project parcel at what is now 100 Manabe Ow Road. This work was completed by November 2016. The engineered fill covered the project site almost in its entirety (except the regional drainage ditch along the western property boundary). On March 9, 2021, the City issued On/Off Site Grading Permit #1029 to import, place, and compact an additional 20,000 cubic yards of fill on the project site at 100 Manabe Ow Road for soil surcharging. That fill was placed on the site in November 2021.

Prominent features within the viewshed of the site include Highway 1 to the west, residential development and Watsonville Slough north of Manabe Ow Road, and other light industrial or warehouse type development to the south. To the east lies additional undeveloped land that was previously used for agriculture.

Scenic Resources and Roadways

According to the CEQA Guidelines, scenic resources include, but are not limited to, trees, rock outcroppings, and historic buildings within a scenic highway. According to the California Department of Transportation (Caltrans) Scenic Highway Program (CSHP), Highway 1 and Highway 152, which traverse the City of Watsonville, are considered “eligible” for the official State Scenic Highway designation.

The City of Watsonville General Plan (2005) designates Highway 1 and Riverside Drive/Highway 129 from Highway 1 to Salsipuedes Creek as scenic roadways within the project area. Highway 1 has direct views to the project site while the Riverside Drive/Highway 129 overpass over Highway 1 offers very limited views of the project site as the views are interrupted by other intervening development between the viewpoint and project site.

Scenic Vistas and Visual Resources

A scenic vista is a view of natural environmental, historic and/or architectural features possessing visual and aesthetic qualities of value to the community. The term “vista” generally implies an expansive view, usually from an elevated point or open area. There are no designated scenic vistas in the vicinity of the project site (RBF 2010).

3.1.2 Regulatory Setting

Caltrans Scenic Highway System

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment.

Watsonville 2005 General Plan

The following policies in the Watsonville 2005 General Plan are applicable to aesthetics and visual character within the planning area.

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.

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.

Policy 5.E, Viewshed Protection - The City shall use the General Plan Land Use chapter and the design review process to ensure that major new development projects do not impact scenic vistas now enjoyed throughout the City.

Policy 5.I, Scenic Streets and Highways - The City shall identify scenic streets and highways in the planning area according to adopted criteria.

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.1, Natural Heritage Preservation. The City should conserve and enhance the natural resource areas of the community that give residents passive recreational and educational opportunities connected with the natural heritage of Watsonville.

Implementation Measure 5.J.2, Compatibility. Whenever a new development is proposed next to a scenic resource, the design review process will be used to maintain or create visual harmony between new and old structures and their natural setting.

Manabe-Ow Business Park Specific Plan

The Manabe-Ow Business Park Specific Plan includes development standards for building setbacks, landscaping, parking, permitted uses, and building height. These development standards supersede the zoning requirements as set forth in the City of Watsonville Municipal Code. Development standards are provided for the "Business Park" land use designations. The Specific Plan design guidelines are intended to provide consistent design guidance for development of the planning area and implement the vision for the planning area as defined by the City of Watsonville General Plan the Specific Plan's Guiding Principles. Design guidelines are provided for each of the land use districts within the planning area and for interim uses and address: site design, architectural design, landscape design, signage, and lighting.

Several objectives in the design guidelines within the proposed Specific Plan are applicable to the aesthetic and visual character of future development within the planning area:

Site Design

- Buildings should orient towards Highway 1 where appropriate by providing elements of interest such as signage and architectural features appropriate to project and building type.
- Pay special attention to areas visible to the public by considering views from streets and highways.
- Orient buildings and associated improvements to minimize noise, light, glare, and other visual impacts to adjacent residential neighborhoods of Sea View Ranch and Las Brisas.

Architectural

- Facades that front the street should be articulated and present the building in a quality and attractive manner. These facades should include architectural variation over at least 15 percent of the façade's linear surface, including the use of windows, trellises, towers, building projections, and recessed building entries.
- Building heights, massing, and setbacks should be varied to define functions and uses such as office and warehouses. Office spaces should be located along the front perimeter of the building whenever practical.

Landscape Design

- A minimum of 10 percent of the net parcel area should be landscaped, five percent of which may include hardscape (entries, plazas, and walkways).
- Landscaping should be provided in various locations around the perimeter of the planning area to be used for screening, noise buffering, and to soften edges. Requirements are as follows:
    - A minimum eight-foot strip should be placed along all rear lot lines adjacent to Paseo Drive within the North Business Park Planning Area.
    - Landscaping should include trees for screening and noise buffering from the adjacent residents.
    - Trees should be grouped at various intervals adjacent to Highway 1 to soften the visual appearance of the built form as seen from Highway 1.

  - Landscaping, including trees for visual buffering, should be incorporated as part of the graded slope adjacent to the Southern Pacific Railroad line on the south edge of the project site.
  - A minimum ten-foot landscape strip should be placed along all lot lines fronting Ohlone Parkway. Landscaping should include a variety of trees, shrubs, grasses, etc. to create a visually attractive edge.
- Parking lot treatments should be consistent and contribute to the project landscape unity. Parking lots should be planted with trees in such a manner as to provide shade for vehicles and pedestrians.

Signage

- Signs should advertise a place of business, provide directions, or other information in an attractive manner without detracting from the overall quality of the site.
- Signs should be integrated into the overall site design by considering design, color, materials, size and placement.
- A project defining monument sign should be placed within the North Business Park adjacent to Highway 1 and tall enough to be seen by passing traffic in both directions. The monument should be visually attractive and should only advertise the name of the business park.

Lighting

- Lighting should be sensitive to adjacent uses, development, and natural slough features.
- Lighting should enhance various features within the planning area, such as entries, sidewalks, and public spaces.
- Lighting should consider energy-efficient light sources.
- To provide cohesive and homogenous illumination for the project site, lot lighting should be provided as such:
  - Parking lots: Total pole and fixture type should be a maximum of 20 feet. Lighting should be spaced to meet industry-recommended light levels for safety and uniformity, but avoid glare and overlighting. Illumination should be a maximum of one foot candle, average, measured at ground level. Cut-off type fixtures are encouraged. “Cobra-head” lights are not permitted
  - Public streets: Total pole and fixture type should be a maximum of 35 feet. Lighting should be spaced every 150 of linear footage, and should meet industry recommended light levels for safety and uniformity. Lighting should be designed with cut-off type fixtures that avoid light leakage and overlighting. “Cobra-head” fixtures are not permitted. Illumination should be a maximum of one foot candle average measured at ground level
  - Landscape and buildings: Lighting should be carefully shielded to avoid spill light onto adjacent properties and into the night sky. Lighting should be subtle. Bollard type light fixtures are encouraged
  - Security lighting: Security lighting is exterior lighting installed solely to enhance the security of people and property. Security lighting should meet the above guidelines and should be designed to control glare. Security lighting fixtures should be aimed at a building rather than mounted on the building

- Solar power lighting: The use of solar powered LED light fixtures are encouraged provided that they meet the recommendations as noted above. Solar lighting supports energy conservation as well as the sustainability of MOBP. Applications of solar powered lighting range from lighting streets to parking lots, pathways, public areas, and landscaping

3.1.3 Thresholds of Significance

The project would have a significant impact to visual and design factors if it would:

a) Substantially degrade the existing visual character or quality of the site and its surroundings.

b) Have a substantial adverse effect on a scenic vista.

c) Substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings and historic buildings.

d) Expose people to substantial light or glare, which would adversely affect day or nighttime views in the area.

For the purposes of this CEQA document, the City considers scenic vista is a view of natural environmental, historic and/or architectural features possessing visual and aesthetic qualities of value to the community. The term “vista” generally implies an expansive view, usually from an elevated point or open area; a viewpoint that is accessible only from private property is not considered a scenic vista.

3.1.4 Impact Discussion

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. There are no designated scenic vistas in the City’s General Plan. In discussing scenic routes, the General Plan notes that the scenic quality of the City is enhanced through the preservation of significant natural features such as wetlands, sloughs, rivers, lakes, hillsides, and stands of vegetation. The project site is located within an urbanized area zoned for industrial park uses and is surrounded by existing and planned urban and industrial park-type development to the north, south, and west. Although the Watsonville Slough and wetland areas are located within the vicinity of the site, the project proposes construction of a rectangular one-story warehouse structure with a two-story office element, similar to existing and proposed structures in the vicinity of the site. The proposed warehouse structure would not substantially affect views of the Watsonville slough or wetlands from any residential areas. The existing trail is located adjacent to and on the opposite side of the slough from Manabe Ow Road and the project site. The construction of an additional warehouse facility at this location would not have a substantial adverse effect on a scenic vista as there are no designated scenic vistas in the vicinity of the project site, nor would it have a substantial adverse effect on any natural features. Therefore, impacts resulting from the project would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The General Plan says that segments of state highways and local streets within the City which satisfy certain criteria have been designated as scenic. It further states that these scenic routes will benefit from the enhancement opportunities available through land use controls and the implementation of General Plan policies. The state highways included in this designation are Highway 1, Highway 152 and Highway 129. The closest of these highways to the project site is Highway 1, located approximately 700 feet west of the project site. The segment of Highway 1 to the west of the project site is eligible for designation as a state scenic highway however, it does not currently have official state scenic highway designated status. The project site would be briefly visible in the distance from motorists traveling along Highway 1, but would not impair views of the hillsides to the east or open spaces to the west, or of any wetlands, slough or rivers, including Watsonville Slough. Therefore, the project would not damage scenic resources within a state scenic highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The conversion of the project site from agricultural and rural residential uses to urban uses was addressed in the EIR for the Manabe Ow Specific Plan and found that development standards for building setbacks, landscaping, parking, permitted uses building height and lot coverage as well as the existing light industrial development in the area would result in a less than significant impact related to changes in visual character. The project includes the planting of 24-inch box sized trees around the perimeter of the site and bioretention basins as well as within the employee parking areas which will enhance views of the proposed development from offsite locations. The building setback from Manabe Ow Road contains landscaped detention basins that feature large deciduous and broadleaf evergreen canopy trees, interspersed with accent trees to provide screening and to soften the appearance of the building from the street. The project is required to comply with the Design Guidelines in the Specific Plan, to ensure the project is of quality design and consistency with Policy 5.B, Design Consistency in the City of Watsonville General Plan. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The project is subject to the lighting standards within the Manabe Ow Business Park Specific Plan which state that lighting should be sensitive and shielded to adjacent land uses and the night sky and subtle, with security lighting solely to enhance the security of people and property. Project plans call for wall mounted light fixtures on the exterior of the building as well as pole mounted lighting at the project driveways and parking entrances. Additional pole-mounted light fixtures are proposed to illuminate the trailer parking areas along the south and west perimeters of the site. The nearest residential uses are located approximately 350 feet north of the site, and the building would partially block the view of these lights from those areas during nighttime hours. In addition, the proposed light fixtures would be shielded to direct

the lighting downward, limiting the amount of light that would radiate beyond the boundaries of the site. All proposed lighting would be designed in conformance with City standards. For these reasons, the project would have a less than significant impact on light and glare.

3.1.5 References

California Department of Transportation (Caltrans). 2022. California State Scenic Highway System Map. Accessed March 8, 2023 at https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

City of Watsonville. 1994. Watsonville 2005 General Plan.

City of Watsonville. 2010. Manabe-Ow Business Park Specific Plan.

City of Watsonville. 2010. Manabe-Ow Business Park Specific Plan Master EIR. December 18, 2008.

RBF Consulting. 2010. Draft Master Environmental Impact Report. Manabe-Ow Business Park Specific Plan. SCH# 2008122060. Prepared for the City of Watsonville.

3.2 AGRICULTURAL AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				

3.2.1 Environmental Setting

The project site is located in the City of Watsonville on land that is designated Industrial on the City's Land Use Diagram and zoned Industrial Park (IP) in the Manabe Ow Specific Plan. All proposed project improvements would occur within an existing, urban area. The California Department of Conservation Farmland Mapping and Monitoring Program identifies the site as Prime Farmland (California Department of Conservation 2022).

When the 2005 City of Watsonville General Plan was adopted, it was recognized that approximately 580 acres of farmland within the boundaries of the General Plan planning area would be converted to urban land under buildout of the General Plan. A Statement of Overriding Considerations was adopted that recognized that agricultural land conversion was a significant and unavoidable impact. This loss of agricultural land was found consistent with the adopted 2005 General Plan that was amended in conjunction with Measure U. Measure U established an Urban Growth Boundary to minimize the loss of additional farmland by focusing development inside the designated urban growth boundaries. The Statement of Overriding Considerations for the Manabe-Ow Business Park Specific Plan states, "Given that Measure U amended the current adopted General Plan (Watsonville 2005), there is no additional impact than would exist at buildout under the current plan". The City Council ultimately found this significant adverse environmental effect acceptable in approving the Manabe-Ow Business Park Specific Plan.

3.2.2 Regulatory Setting

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is called Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned.

3.2.3 Thresholds of Significance

The project would have a significant impact on agriculture and forestry resources if it would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use,

b) Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract,

c) Result in the loss of forest land or conversion of forest land to non-forest use, or

d) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

3.2.4 Impact Discussion

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less Than Significant Impact. Following adoption of the 2005 City of Watsonville General Plan by the City in 1994, Measure U was passed by 60 percent of the voters in 2002. Measure U directs new growth to designated areas within and around the City of Watsonville in order to protect agricultural lands and environmentally sensitive areas, while providing the means for the City to address housing and job needs for the next 20 to 25 years. Measure U established an urban limit line (ULL) along the City's northern boundary, which excludes land previously included east and west of East Lake Avenue, and directs growth into several unincorporated areas. The three primary areas of growth permitted under the ULL include the Atkinson Lane, Buena Vista, and the Manabe-Ow Specific Plan areas. A western boundary west of Highway 1 was defined by Measure U to remain undeveloped.

The 2005 City of Watsonville General Plan evaluated the conversion of up to 580 acres of Important Farmland within the ULL. A Statement of Overriding Considerations was adopted for the conversion of prime farmland in the City of Watsonville 2005 General Plan EIR. The planning area for the Manabe-Ow Business Park Specific Plan was defined as part of the future agricultural land conversion that was found to be a significant and unavoidable impact for which the City of Watsonville adopted a Statement of Overriding Considerations. However, since the conversion of Prime Farmland and Farmland of Statewide Importance cannot be reproduced elsewhere, this was found to be a significant and unavoidable impact of the Specific Plan project for which no feasible mitigation measures were available to reduce this impact.

The proposed project would convert land that is currently designated Prime Farmland on the California Important Farmland Map (California Department of Conservation 2022) into a developed industrial site. However, as noted above, because the conversion of this land was previously reviewed under CEQA and found to be a significant and unavoidable impact, the implementation of the proposed project, which is consistent with the existing General Plan and zoning designations allowing industrial uses on the site, including the ULL established by the citizen initiative Measure U, would result in a less than significant impact.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. The project is consistent with the existing Industrial zoning designation on the site. The site is not under a Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The project site is zoned Industrial. There is no forest land or timberland on the project site.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. There is no forest land or timberland on the project site.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project is located within the Manabe-Ow Business Park Specific Plan area, which allows industrial uses on land that is currently designated Prime Farmland (see discussion under Question a, above). The project would have no effect on other properties within the Specific Plan area and would therefore not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

3.2.5 References

California Department of Conservation. 2022. California Important Farmland Finder. Accessed on October 5, 2022 at https://maps.conservation.ca.gov/DLRP/CIFF/.

City of Watsonville. 2019. Land Use Diagram – Watsonville 2005 General Plan. June 19. Accessed on October 5, 2022 at: https://www.cityofwatsonville.org/DocumentCenter/View/106/2005-General-Plan-Land-Use-Diagram-.

City of Watsonville. 2020. Zoning Map – City of Watsonville. July 29. Accessed on October 5, 2022 at: https://www.cityofwatsonville.org/DocumentCenter/View/2561/Zoning-Map.

California Department of Fish and Wildlife. 2019. Natural Resources, NLCD 2016 Land Cover (California) Reference Layer. Accessed on April 24, 2023 at https://apps.wildlife.ca.gov/lands/

California Department of Fish and Wildlife. 2019. Timberland Conservation and Fire Resiliency Program. Accessed on April 26, 2023 at https://wildlife.ca.gov/Conservation/Timber

3.3 AIR QUALITY

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

The following discussion and analyses are based on the 100 Manabe Ow Road Industrial Project Air Quality and Health Risk Assessment Report prepared by MIG. A copy of this report is included in Appendix A to this IS. Refer to this report for more detailed information on the project's environmental and regulatory setting and discussion of the project's potential air quality impacts.

3.3.1 Environmental Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. Physical atmospheric conditions such as air temperature, wind speed and topography influence air quality. The U.S. Environmental Protection Agency (U.S. EPA) and California Air Resources Board (CARB) are the federal and state agencies charged with maintaining air quality in the nation and state, respectively. The U.S. EPA delegates much of its authority over air quality to CARB. CARB has geographically divided the state into 15 air basins for the purposes of managing air quality on a regional basis. An air basin is a CARB-designated management unit with similar meteorological and geographic conditions. The proposed project is in the northern portion of the North Central Coast Air Basin (NCCAB). Regionally, the Monterey Bay Air Resources District (MBARD) is the agency responsible for managing air quality in the NCCAB.

Regulated Air Pollutants

The U.S. EPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O_3), particulate matter (PM), which consists of "inhalable coarse" PM (particles with an aerodynamic diameter between 2.5 and 10 microns in diameter, or PM_{10}) and "fine" PM (particles with an aerodynamic diameter smaller than 2.5 microns, or $PM_{2.5}$), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. The U.S. EPA refers to these six common pollutants as "criteria" pollutants because the agency regulates the pollutants

on the basis of human health and/or environmentally-based criteria. CARB has established California Ambient Air Quality Standards (CAAQS) for the six common air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS) plus the following additional air pollutants: hydrogen sulfide (H_2S), sulfates (SO_X), vinyl chloride, and visibility reducing particles. In addition to these criteria pollutants, the U.S. EPA and CARB have classified certain air pollutants as hazardous air pollutants (HAPs) or toxic air contaminants (TACs), respectively, such as asbestos and diesel particulate matter (DPM).

The U.S. EPA, CARB, and MBARD assess the air quality of an area by measuring and monitoring the amount of pollutants in the ambient air and comparing pollutant levels against NAAQS and CAAQS. Based on these comparisons, regions are classified into one of the following categories:

- **Attainment.** A region is "in attainment" if monitoring shows ambient concentrations of a specific pollutant are less than or equal to NAAQS or CAAQS. In addition, an area that has been re-designated from nonattainment to attainment is classified as a "maintenance area" for 10 years to ensure that the air quality improvements are sustained.
- **Nonattainment.** If the NAAQS or CAAQS are exceeded for a pollutant, the region is designated as nonattainment for that pollutant. It is important to note that some NAAQS and CAAQS require multiple exceedances of the standard in order for a region to be classified as nonattainment. Federal and state laws require nonattainment areas to develop strategies, plans, and control measures to reduce pollutant concentrations to levels that meet, or attain, standards.
- **Unclassified.** An area is unclassified if the ambient air monitoring data are incomplete and do not support a designation of attainment or nonattainment. Air pollution levels are measured at monitoring stations located throughout the air basin.

The proposed project is in Santa Cruz County, in the northern portion of the NCCAB, which is an area of nonattainment for State PM_{10} standards (CARB, 2020).

North Central Coast Air Basin

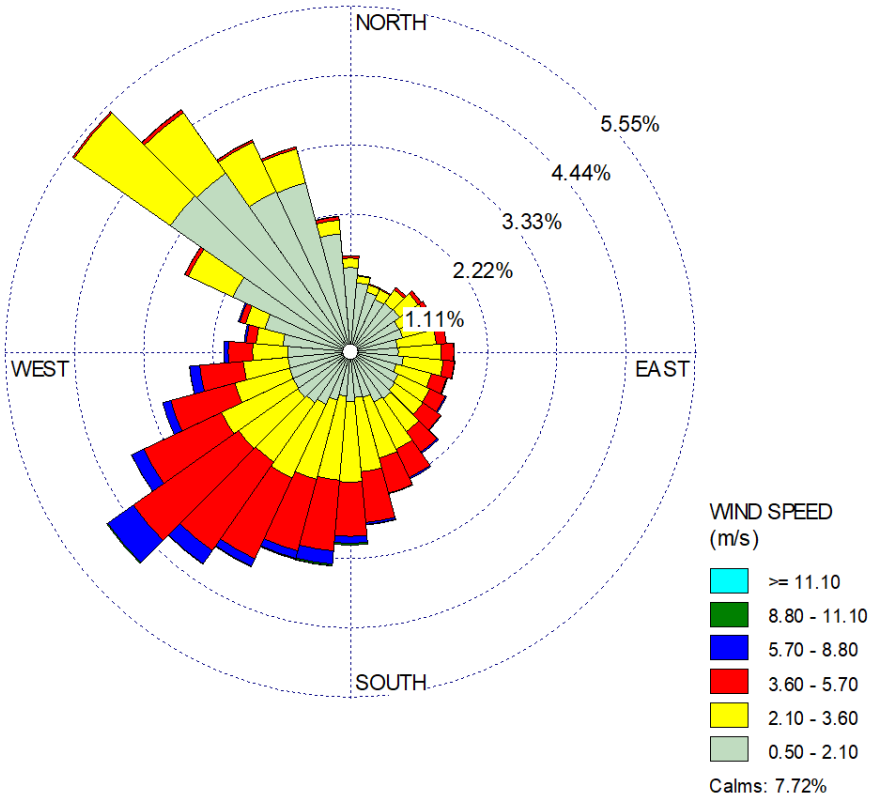
The NCCAB encompasses all of Santa Cruz, San Benito, and Monterey Counties. There are several mountain ranges and valleys in the NCCAB that influence atmospheric circulation. In the northern part of the NCCAB, the Santa Cruz Mountains to the northwest and the Diablo Range to the northeastern form the Santa Clara Valley. The climate is dominated by the Pacific high-pressure system, which in the summer causes the prevailing west and northwest winds in the NCCAB and forms an inversion layer over the coastal areas. A temperature inversion is created when a layer of cool air is overlain by a layer of warmer air; this can occur over coastal areas when cool, dense air that originates over the ocean is blown onto land and flows underneath the warmer, drier air that is present over land. In the fall, surface winds are weaker and the Pacific high-pressure system further prevents the movement of air while north or east winds transport pollutants from the San Francisco Bay or Central Valley into the NCCAB, causing high pollutant concentrations. In the winter, the Pacific high-pressure system has less influence on the NCCAB, there is greater air flow to the east, and inversions that prevent the dispersion of pollutants generally do not occur, resulting in a lower concentration of pollutants during winter. Portions of the coastal plains have better air circulation than in the inland valleys, also resulting in lower air pollutant concentrations for some coastal areas (County of Santa Cruz, 2022).

Local Site Conditions

The project is located in the southwestern part of the City of Watsonville, approximately 630 feet east of Highway 1. The project site is currently undeveloped. For the purposes of this IS, it is assumed the site does not involve any activities that generate emissions of regulated air pollutants. Although the site does not generate emissions, existing industrial/warehousing uses near the site, as well as vehicles on the Highway 1 and local roadways all contribute to the local air quality conditions in the vicinity of the project site.

MBARD maintains public meteorological data for use in air quality analyses. The closest meteorological station with data representative of those at the project site is from the Watsonville Municipal Airport, approximately 2.2 miles north of the project site. The wind rose for the Watsonville Municipal Airport, shown in Figure 14, indicates the prevailing wind near the project site is from the southwest.

Figure 14: 2015 – 2019 Wind Rose for Watsonville Municipal Airport Meteorological Station (Blowing From)



Source: MBARD, 2022

Sensitive Air Quality Receptors

Some people are more affected by air pollution than others. Sensitive air quality receptors include specific subsets of the general population that are susceptible to poor air quality and the potential

adverse health effects associated with poor air quality. MBARD generally defines sensitive air quality receptors to include any residence (e.g., private homes, condominiums, apartments, and other living quarters such as prisons and dormitories), education facilities (e.g., preschool and kindergarten through grade twelve schools), daycare centers, and health care facilities (e.g., hospitals, hospice care, and retirement and nursing homes) (MBARD 2008). The sensitive receptors within 1,000 feet of the project site include:

- The residences/residential area adjacent to Lighthouse Drive, approximately 380 feet northwest of the project site (at closest).
- The residential area adjacent to Bree Lane, approximately 360 northeast of the project site.
- Seaview Ranch Park, approximately 350 feet north of the project site.
- Las Brisas Park, approximately 930 feet north of the project site.

The nearest school, Landmark Elementary School, is located approximately 2,800 feet (0.5 miles) north of the project site.

Disadvantaged Community Status

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. CalEnviroScreen was originally developed as part of Senate Bill (SB) 535 and used to identify disadvantaged communities for the purposes of allocating funding from the State's Cap-and-Trade regulation.

The mapping tool uses environmental, health, and socioeconomic information to produce pollution indicator scores for every census tract in the state, and the scores are then mapped so that different communities can be compared. Percentiles are assigned to each census tract based on the census tract's score in relation to the rest of the state. An area with a high percentile is one that experiences a much higher pollution burden than areas with low scores. For example, if a census tract has an indicator in the 40th percentile, it means that indicator's percentile is higher than 40 percent of the census tracts in the state.

According to the Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 4.0 Map, the project is in census tract 6087110400. This tract has an average pollution indicator percentile of 81 percent based on a population of 8,077 people (OEHHA, 2021b). Exposure to DPM and pesticides are two of the highest risk indicators for this census tract.

Since this tract is in the top 25 percent of total CalEnviroScreen percentiles throughout the State, it is substantially burdened by exposure to pollution and socioeconomic factors and considered a disadvantaged community pursuant to SB 535.

3.3.2 Regulatory Setting

CARB In-Use Off-Road Diesel Vehicle Regulation

On July 26, 2007, CARB adopted a regulation to reduce DPM and NO_x emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. This regulation applies to all off-road diesel vehicles over 25

horsepower (hp) used in California and most two-engine vehicles (except on-road two-engine sweepers), which are subject to the *Regulation for In-Use Off-Road Diesel Fueled Fleets (Off-Road regulation).* Additionally, vehicles that are rented or leased (rental or leased fleets) are included in this regulation. This regulation:

- Imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles;
- Requires all off-road diesel vehicles over 25-horsepower be reported to CARB (using the Diesel Off-Road Online Report System DOORs) and labeled;
- Restricts the adding of older vehicles into fleets; and,
- Requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits).

CARB On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation

CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) regulation (also known as the Truck and Bus Regulation) is intended to reduce emission of NO_X, PM, and other criteria pollutants generated from existing on-road diesel vehicles operating in California. The regulation applies to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds that are privately or federally owned, and for privately and publicly owned school buses. Heavier trucks and buses with a GVWR greater than 26,000 pounds must comply with a schedule by engine model year or owners can show compliance with more flexible options. Fleets complying with the heavier trucks and buses schedule must install the best available PM filter on 1996 model year and newer engines, and replace the vehicle 8 years later. Trucks with 1995 model year and older engines had to be replaced starting in 2015. Replacements with a 2010 model year or newer engine meet the final requirements, but owners can also replace the equipment with used trucks that have a future compliance date (as specified in regulation). Starting on January 1, 2023, all trucks and buses operating in California, with few exceptions, were required to have 2010 model year engines or newer.

CARB Stationary Diesel Engines – Emissions Regulations

In 1998, CARB identified DPM as a TAC. To reduce public exposure to DPM, in 2000, the CARB approved the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Risk Reduction Plan) (CARB 2000). Integral to this plan is the implementation of control measures to reduce DPM such as the control measures for stationary diesel-fueled engines. As such, diesel generators must comply with regulations under CARB's amendments to *Airborne Toxic Control Measure for Stationary Compression Ignition Engines* and be permitted by MBARD.

Monterey Bay Air Resources District

The MBARD is the agency primarily responsible for maintaining air quality and regulating emissions of criteria and toxic air pollutants within the NCCAB. The MBARD carries out this responsibility by preparing, adopting, and implementing plans, regulations, and rules that are designed to achieve attainment of state and national air quality standards.

MBARD's most recent air quality management plan (AQMP) is the 2012-2015 AQMP, which was approved by MBARD in June 2017. The 2012-2015 AQMP provides an updated air quality trend analysis, emissions inventory, and mobile source programs, as well as an assessment of the progress towards meeting the State 8-hour ozone standard (MBARD 2017). The 2012-2015 AQMP only addresses ozone attainment, for which the Basin is now in compliance (CARB 2020).

The MBARD also adopts rules that establish permissible air pollutant emissions and govern a variety of businesses, processes, operations, and products. MBARD does not adopt rules for mobile sources; those are established by CARB or the U.S. EPA. The MBARD currently has 8 regulations containing more than 110 rules that control and limit emissions from sources of pollutants. In general, the MBARD rules that may apply to the project include:

- Rule 200 (Permits) requires any business or person to obtain an Authority to Construct and Permit to Operate before installing or operating new equipment or processes that may release or control air pollutants to ensure that all MBARD rules and regulations are considered.
- Rule 400 (Visible Emissions) prohibits discharge into the atmosphere from any emission source whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour.
- Rule 402 (Nuisance) prohibits 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 403 (Particulate Matter) regulates the discharge of particulate matter from any source that operates in the MBARD.
- Rule 404 (Sulfur Compounds and Nitrogen Oxides) sets limits for the emissions of sulfur compounds, nitrogen oxides, and nitrogen dioxide from sources within the District.
- Rule 416 (Solvents) sets limits the emissions of volatile organic compounds (VOCs) that are used as solvents.
- Rule 425 (Use of Cutback Asphalt) sets limits on the manufacture, offer for sale or sell a liquid asphalt or emulsified asphalt product.
- Rule 426 (Architectural Coatings) prohibits the use of any architectural coating with a VOC content in excess of the limits specified in the rule.
- Rule 1010 (Air Toxic Control Measure for Stationary Compression Ignition Engines) reduces emissions from stationary diesel-fueled compression ignition engines, including diesel-fired backup generators. The rule limits DPM emissions to no more than 0.15 grams per brake horsepower hour. Backup generators may not be operated more than 50 hours per year for maintenance and testing purposes.

3.3.3 Thresholds of Significance

The project would have a significant impact on air quality if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Conflict With or Obstruct Implementation of the Applicable Air Quality Plan

Section 5.5 of the MBARD CEQA Air Quality Guidelines document provides criteria for evaluating consistency between proposed projects and the AQMP. As provided for the CEQA Air Quality Guidelines document, "The District prepares air quality plans which address attainment of the State ozone AAQS and maintenance of federal AAQS. These plans accommodate growth by projecting growth in emissions based on different indicators. For example, population forecasts adopted by AMBAG are used to forecast population-related emissions." A project would conflict with or obstruct implementation of the AQMP if it is inconsistent with the plan's growth assumptions, in terms of population, employment, or regional growth in VMT. These forecasts were developed, in part, using data obtained from local jurisdictions regarding projected land uses and population projections identified in community plans. As such, projects that are consistent with the AMBAG's regional forecasts would be considered consistent with the AQMP.

Another criterion for evaluating project consistency with the AQMP is based on the project's potential to increase criteria air pollutant emissions. Projects that result in a significant increase in emissions, defined as in excess of MBARD significance thresholds, would also be considered to potentially conflict with or obstruct implementation of the AQMP.

Cumulatively Considerable Net Increase of Non-Attainment Criteria Air Pollutants and Expose Receptors to Substantial Pollutant Concentrations

The MBARD's recommended thresholds of significance for criteria pollutants and incremental increases in health risk are shown in Table 3.3-1.

Table 3.3-1: MBARD-Recommended CEQA Thresholds		
Pollutant	***Maximum Daily Emissions (lbs/day)[(A)]***	
	Construction	***Operation***
NO_X	--	137
VOC/ROG	--	137
PM_{10}	82	82
$PM_{2.5}$	--	--
SO_X	--	150
CO	--	550[(B)]
TACs	Maximum Incremental Cancer Risk ≥ 1 in 100,000 Chronic & Acute Hazard Index ≥ 1.0 (project increment)	

Source: MBARD, 2008

(A) Projects that emit other criteria air pollutants would have a significant impact if emissions would cause or substantially contribute to the violation of a State or national AAQS. Criteria pollutant emissions could also have a significant impact if they would alter air movement, moisture, temperature, climate, or create objectionable odors in substantial concentrations.

(B) CO impacts may also occur if the level of service (LOS) at intersection/road segment degrades from D or better to E or volume/capacity (V/C) ratio at intersection/road segment at LOS E or F increases by 0.05 or more or delay at intersection at LOS E or F increases by 10 seconds or more or reserve capacity at unsignalized intersection at LOS E or F decreases by 50 or more.

As shown in Table 3.3-1, MBARD maintains only quantitative construction criteria air pollutant emissions threshold for PM_{10}. This is primarily because the northern portion of the NCCAB, in which the project site is located, is an area of nonattainment for State PM_{10} standards. The MBARD CEQA Air Quality Guidelines document considered construction emissions that contribute to ozone concentrations (e.g., NOx and VOCs) when developing their construction thresholds of significance but do not establish a quantitative limit for emissions other than PM_{10}, stating:

> "Construction projects using typical construction equipment such as dump trucks, scrappers, bulldozers, compactors and front-end loaders that temporarily emit precursors of ozone [i.e., volatile organic compounds (VOC) or oxides of nitrogen (NOx)], are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone AAQS. The District should be consulted regarding emissions from non-typical equipment, e.g., grinders, and portable equipment" (MBARD, 2008; pg. 5-3).

Although not explicitly stated, it is anticipated that MBARD's rationale for not establishing quantitative construction thresholds for NOx or VOCs is also true for $PM_{2.5}$, since the NCCAB, which is designated as attainment for ozone, is also designated as attainment for $PM_{2.5}$.

The proposed project does not involve emissions from atypical equipment. Therefore, the project's construction and operational criteria air pollutants are evaluated based on the thresholds of significance identified in the MBARD CEQA Air Quality Guidelines document (MBARD, 2008; see Table 5-1 on pg. 5-3 for construction emissions and Table 5-3 on pg. 5-6 for operational emissions). Additional quantitative thresholds for construction activities are not applied to the

project, because 1) they are not maintained by the MBARD, and 2) are not needed, per MBARD's MBARD CEQA Air Quality Guidelines document, because the emissions are accommodated in the emission inventories of State- and federally-required air plans.

For the purposes of assessing cumulative impacts from receptor exposure to TACs, MBARD has provided guidance that if a project does not have a project-level impact (i.e., exceed the cancer and noncancer – chronic and acute hazards – see Table 3.3-1), the project would also not result in a cumulatively considerable impact (MBARD, 2023).

Odors

Page 5-9 in the MBARD CEQA Air Quality Guidelines document states that odor impacts would be significant if the project would generate odors that cause injury, nuisance, or annoyance to a considerable number of persons or would endanger the comfort, health, or safety of the public.

3.3.4 Impact Discussion

Would the proposed project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. In May 2017, the MBARD adopted the 2012-2015 Air Quality Management Plan (AQMP), which assesses and updates the elements of the 2008 AQMP and the Triennial Plan Revision 2009-2011, including the air quality trends analysis, emission inventory, and mobile source programs (MBARD, 2017). The MBARD's CEQA Air Quality Guidelines document provides a list of actions that are intended to ensure consistency with the AQMP (MBARD, 2008). The most applicable action from the CEQA Air Quality Guidelines is assessing the growth assumptions associated with a proposed project with the population and dwelling unit forecasts adopted by the Association of Monterey Bay Area Governments (AMBAG), since the AMBAG population and dwelling unit forecasts are used to generate emission forecasts upon which the AQMP is based.[1] As such, projects that are consistent with the AMBAG's regional forecasts would be considered consistent with the AQMP. Another criterion for evaluating project consistency with the AQMP is based on the project's potential to increase criteria air pollutant emissions. Projects that result in a significant increase in emissions, defined as in excess of MBARD significance thresholds, would also be considered to potentially conflict with or obstruct implementation of the AQMP.

The project is anticipated to support approximately 60 employees, which is within the growth forecasts developed by the AMBAG's 2010 Monterey Bay Area Metropolitan Transportation Plan

[1] Section 5.5 of the MBARD CEQA Air Quality Guidelines document provides criteria for evaluating consistency between proposed projects and the AQMP. As provided for the CEQA Air Quality Guidelines document, "The District prepares air quality plans which address attainment of the State ozone AAQS and maintenance of federal AAQS. These plans accommodate growth by projecting growth in emissions based on different indicators. For example, population forecasts adopted by AMBAG are used to forecast population-related emissions."

(MTP), Monterey Bay Area Mobility 2035 (Kimley Horn 2023) (AMBAG, 2010).[2] As such, the project would not conflict with the AQMP with regard to the first criterion. In addition, as described under Section 3.3.4(b), the proposed project would not exceed the MBARD's construction or operational significance thresholds for criteria air pollutant emissions. Therefore, the project would not conflict with nor obstruct implementation of the AQMP. No impact would occur.

b) 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?

Less than Significant Impact. The project would generate both short-term construction emissions and long-term operational emissions. The project's potential emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.0. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed MBARD-recommended criteria air pollutant thresholds.

Construction Emissions

The proposed project involves the construction of a new, approximately 175,760 square-foot industrial warehouse building on approximately 13.4 acres of land. Construction activities would disturb the entire site and include site preparation, grading, building construction, paving, and architectural coating phases. Grading would require the net export of approximately 24,500 cubic yards of soil to an adjacent property across Ohlone Parkway. Construction activities are anticipated to begin in late-2023 and last approximately 17 months.[3] The project would require varying types of equipment throughout the different construction phases including, but not limited to: bulldozers, backhoes, loaders, graders, cranes and forklifts. The project's construction phasing and the typical pieces of heavy-duty, off-road construction equipment that would be required during each phase are summarized in Table 3.3-2.

[2] Although there is a new MTP for the region, the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy, the AQMP's air quality projections are based on the growth assumptions in the previous MTP. Therefore, consistency with regard to the AQMP is based on the previous iteration of the MTP. Appendix H to Monterey Bay Area Mobility 2035 identifies that Santa Cruz County would have 126,870 employees in 2020 and 133,350 employees in 2025. Current State Employment Development Department (EDD) figures estimate total farm and non-farm employment in Santa Cruz County as of July 2022 to be 111,500.

[3] The CalEEMod emissions modeling is based on construction activities beginning in mid-2023; however, in actuality, it is anticipated that project construction would not actually begin until late-2023 or even 2024. If construction activities begin later than modeled, which would also push back the project's first operational year, average fleet-wide fuel efficiency of off-road vehicles, cars, and trucks would be anticipated to improve over time due to actions taken at the site level and the turnover of older, less efficient vehicles. Therefore, the emissions estimates presented in this Initial Study provide a conservative (i.e., likely to overstate) potential emissions and impacts associated with the project.

Table 3.3-2: Construction Activity, Duration, and Typical Equipment		
Construction Activity	***Duration (Days)[(A)]***	***Typical Equipment Used[(B)]***
Site Preparation	10	Dozer, backhoe
Grading	30	Excavator, loader grader, dozer
Building Construction	343	Crane, forklift, welder, backhoe
Paving	20	Paver, roller
Architectural Coating	10	Air compressors

Source: CA Ventures, 2023 modified by MIG (see Appendix A).

(C) Days refers to total active workdays in the construction phase, not calendar days.

(D) The typical equipment list does not reflect all equipment that would be used during the construction phase. Not all equipment would operate eight hours per day each workday.

The project's unmitigated maximum daily construction emissions, expressed in pounds per day (lbs/day), are shown in Table 3.3-3. Please refer to Appendix A for CalEEMod output files and detailed construction emissions assumptions.

As shown in Table 3.3-3, the project would not result in construction emissions that exceed the MBARD's only established construction criteria air pollutant emission threshold of 82 lbs/day for PM_{10}. In addition, compliance with existing MBARD rules and regulations, such as Rule 426 (Architectural Coatings) and Rule 425 (Use of Cutback Asphalt) would further minimize potential short-term criteria air pollutant emissions. This impact would be less than significant.

Although the proposed project would not exceed the MBARD's only established construction criteria air pollutant emission threshold, construction activities still have the potential to conflict with MBARD Rule 402 (Nuisances). Accordingly, the City would implement the following air quality Best Management Practices (BMPs) to reduce construction-related fugitive dust and exhaust emissions.

Table 3.3-3: Unmitigated Maximum Daily Construction Emissions (lbs/day)

Construction Activity	*ROG*	*NO_X*	*CO*	*SO_2*	*PM_{10}(A)*	*$PM_{2.5}$(A)*
Year 1 (2023)						
Site Preparation	4.1	40.3	36.6	0.1	9.6	5.6
Grading	3.9	39.9	33.7	0.1	66.2	9.0
Building Construction	1.7	13.4	17.8	<0.1	1.2	0.7
MBARD Threshold(B)	**--**	**--**	**--**	**--**	**82**	**--**
Threshold Exceeded?	**--**	**--**	**--**	**--**	**No**	**--**
Year 2 (2024)						
Building Construction	1.6	12.7	17.4	<0.1	1.2	0.6
Paving	1.8	8.3	11.0	<0.1	0.5	0.4
Architectural Coating	169.1	1.0	1.9	<0.1	0.1	<0.1
MBARD Threshold(B)	**--**	**--**	**--**	**--**	**82**	**--**
Threshold Exceeded?	**--**	**--**	**--**	**--**	**No**	**--**

Source: MIG, 2023 (See Appendix A).

(A) Total particulate matter includes both exhaust and dust emissions (see Appendix A emissions breakdown by phase).

(B) MBARD maintains only quantitative construction criteria air pollutant emissions threshold for PM_{10}. This is primarily because the northern portion of the NCCAB, in which the project site is located, is an area of nonattainment for State PM_{10} standards. The MBARD CEQA Air Quality Guidelines document considered construction emissions that contribute to ozone concentrations (e.g., NOx and VOCs) when developing their construction thresholds of significance but do not establish a quantitative limit for emissions other than PM_{10}, stating:

> "Construction projects using typical construction equipment such as dump trucks, scrappers, bulldozers, compactors and front-end loaders that temporarily emit precursors of ozone [i.e., volatile organic compounds (VOC) or oxides of nitrogen (NOx)], are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone AAQS. The District should be consulted regarding emissions from non-typical equipment, e.g., grinders, and portable equipment" (MBARD, 2008; pg. 5-3)."

Although not explicitly stated, it is anticipated that MBARD's rationale for not establishing quantitative construction thresholds for NOx or VOCs is also true for $PM_{2.5}$, since the NCCAB, which is designated as attainment for ozone, is also designated as attainment for $PM_{2.5}$.

Construction Fugitive Dust and Exhaust Emissions Best Management Practices: The City shall require the applicant to incorporate the following construction air quality best management practices into all applicable project bid, design, and engineering documents:

1) All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) shall be watered at least twice per day, at a minimum.

2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

3) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.

4) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

5) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

6) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

7) All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) shall be watered at least twice per day, at a minimum.

8) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

9) All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

10) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.

11) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

12) All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.

13) All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

14) Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.

15) Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours.

16) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

17) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

18) Stage construction equipment and materials as far away as possible from residential land uses to the extent feasible.

Operational Emissions

Upon completion of construction activities, the project would operate as an industrial warehouse and distribution facility. The operation of this land use would generate emissions of regulated air pollutants from:

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

The project's operational emissions were estimated using CalEEMod. The operational emissions generated in CalEEMod are based on the project's first year of operation (anticipated to be 2025, but could be as early as the latter half of 2024) using default data assumptions provided by CalEEMod, with the following project-specific modifications:

- **Road Dust:** For operational road dust, the percentage of paved roads was modified to reflect the fact that all roads accessing the project site are paved.
- **Trip Generation Rates.** CalEEMod default trip generation rates were replaced with the project-specific trip generation rates contained in the Transportation Impact Study (TIS) prepared for the project (Kimley Horn, 2023). According to the TIS, the project would generate 316 total daily weekday trips, including 211 passenger car trips and 105 truck trips.
- **Trip Lengths.** CalEEMod default trip lengths were replaced with the project-specific employee trip length contained in the TIS prepared for the project (Kimley Horn, 2023). According to the TIS, the average employee trip length for the project is 15.1 vehicle miles travelled per employee. Truck trips were assumed to travel 40 miles per one-way trip distance, based on warehouse truck travel distances collected by the South Coast Air Quality Management District (SCAQMD, 2018). A weighted average trip distance was then derived and input into the model.
- **Energy:** The Applicant has indicated that the project would be all-electric, and that natural gas plumbing and infrastructure would not be installed on site. Accordingly, the natural gas energy consumption estimates generated by CalEEMod were converted into electricity consumption estimates and added to CalEEMod's default electricity consumption estimates for the project.

The project's unmitigated maximum daily operational emissions, expressed in pounds per day (lbs/day), are shown in Table 3.3-4 Please refer to Appendix A for CalEEMod output files and detailed operational emissions assumptions.

Table 3.3-4: Unmitigated Maximum Daily Operational Emissions (lbs/day)						
Operational Source	***ROG***	***NO_X***	***CO***	***SO_2***	***PM_{10}(A)***	***$PM_{2.5}$(A)***
Summer						
Mobile	2.5	18.4	32.2	0.1	2.9	0.7
Area	5.4	0.1	7.7	<0.1	<0.1	<0.1
Total(B)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
MBARD Threshold	**137**	**137**	**500**	**150**	**82**	**--**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**--**
Winter						
Mobile	2.6	19.5	32.2	0.1	2.9	0.7
Area	4.1	--	--	--	--	--
Total(B)	6.7	19.5	32.2	0.1	2.9	0.7
MBARD Threshold	**137**	**137**	**500**	**150**	**82**	**--**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**--**

Source: MIG, 2023 (See Appendix A).
(A) Total particulate matter includes both exhaust and dust emissions (see Appendix A emissions breakdown by phase).
(B) Totals may not equal due to rounding.

As shown in Table 3.3-4, the project would not result in operational emissions that exceed the MBARD's operational criteria air pollutant emission thresholds. This impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. As described in Section 3.3.1, sensitive residential receptors are generally located northwest of the project site, across the Watsonville Slough, on Lighthouse Drive and north of the project site, along Bree Lane. Construction and operational emissions would have the potential to expose sensitive receptors to DPM, a TAC; therefore, construction and operational and health risk assessments (HRAs) were prepared for the project. The analysis below identifies health risk estimates and discusses health risk considerations with regard to the activities proposed by the project. See Appendix A for details on the parameters used in the air dispersion modeling and methodology employed for estimating potential health risks.

Health Risk Assessment

Project-related construction and operational activities would emit PM_{10} from on- and off-site construction equipment exhaust, on-site distribution truck travel and maneuvering, and truck idling (see Figure 15 and Figure 16). Nearly all the project's PM_{10} emissions from equipment exhaust would be DPM, a TAC. Accordingly, an HRA was prepared to assess potential risks associated with sensitive receptor exposure to DPM during project construction and operational activities. The HRA evaluated DPM emissions associated with on- and off-road diesel fuel trucks and equipment; gasoline-fuel vehicles emit various TACs in much smaller quantities and health toxicity compared to DPM. Thus, gasoline fueled emission sources were not included in the HRA. Refer to Appendix A for detailed emission and modeling assumptions used to conduct the HRA.

The project would involve different construction activities occurring at different intensities over an approximately 17-month period, assumed to start as soon as late-2023. Receptors would be exposed to varying concentrations of pollutants throughout the construction period. Following construction, receptors would be exposed to DPM concentrations associated with regular operations of the industrial distribution and warehouse facility. Health risks were assessed according to the recommendations in the Office of Environmental Health Hazard Assessment's *Air Toxics Hot Spots Program Guidance Manual* (OEHHA, 2015). Ground-level construction DPM concentrations were estimated using AERMOD. These concentrations were then used to derive the individual excess cancer risk and non-carcinogenic health hazard index for sensitive receptors that could be exposed to DPM. Refer to Appendix A for detailed CalEEMod and AERMOD[4] modeling assumptions, output files, and HRA calculations.

Figure 15: Modeled Construction DPM Sources

Source: MIG, 2023 (see Appendix A)

[4] The AERMOD dispersion model is an EPA-approved and MBARD-recommended model for simulating the dispersion of pollutant emissions and estimating ground level concentrations of pollutants at specified receptor locations.

Figure 16: Modeled Operational DPM Sources

Source: MIG, 2023 (see Appendix A)

Individual Carcinogenic Risk from Exposure to Construction and Operational DPM

The predicted locations of the annual Point of Maximum Impact (PMI) and the Maximum Exposed Individual Receptor (MEIR) for DPM exposure are summarized in Table 3.3-5 and shown in Figure 17 and Figure 18.

As shown in Figure 17 and Figure 18, for construction (both years), the predicted PMI is located north of the Project site, in the middle of Manabe Ow Road. For operations, the predicted PMI is located south of the site, near the northeastern corner of the property at 1220 W Beach St. Since the PMI for DPM exposure for both the construction and operational scenarios is located on land that is not occupied by a sensitive receptor on a permanent basis, lifetime excess cancer risks and chronic non-cancer health hazards, which are based on exposure to annual average pollutant concentrations, were not estimated at these points. Rather, health risks were assessed at the modeled MEIR location. For construction (both years) and operation, the MEIR for DPM exposure is located adjacent to the multi-family residential building at 300 Bree Lane (the Stone Creek Apartments).[5]

[5] This MEIR location is along the southern portion of the Stone Creek Apartments between Seaview Ranch Park to the west and Ohlone Parkway to the east.

Table 3.3-5: Summary of Modeled Maximum DPM Exposure (PMI and MEIR)

Modeled Scenario	***UTM Coordinates and Modeled Annual Average DPM Concentration[A]***					
	Point of Maximum Impact (PMI)			***Maximum Exposed Individual Receptor (MEIR)***		
	X (Easting)	***Y (Northing)***	***Concentration (µg/m³)[B]***	***X (Easting)***	***Y (Northing)***	***Concentration (µg/m³)[B]***
Construction Year 1	609148.95	4084938.89	0.14518	609173.95	4085063.89	0.03496
Construction Year 2	609148.95	4084938.89	0.06458	609173.95	4085063.89	0.01554[C]
Operations (Year 3 – 30)	609248.95	4084788.89	0.00313	609173.95	4085063.89	0.00051

Source: MIG, 2023 (see Appendix A)

(A) Universal Transverse Mercator (UTM) coordinates are for Zone 10S, northern hemisphere.

(B) Units express in terms of micrograms per cubic meter.

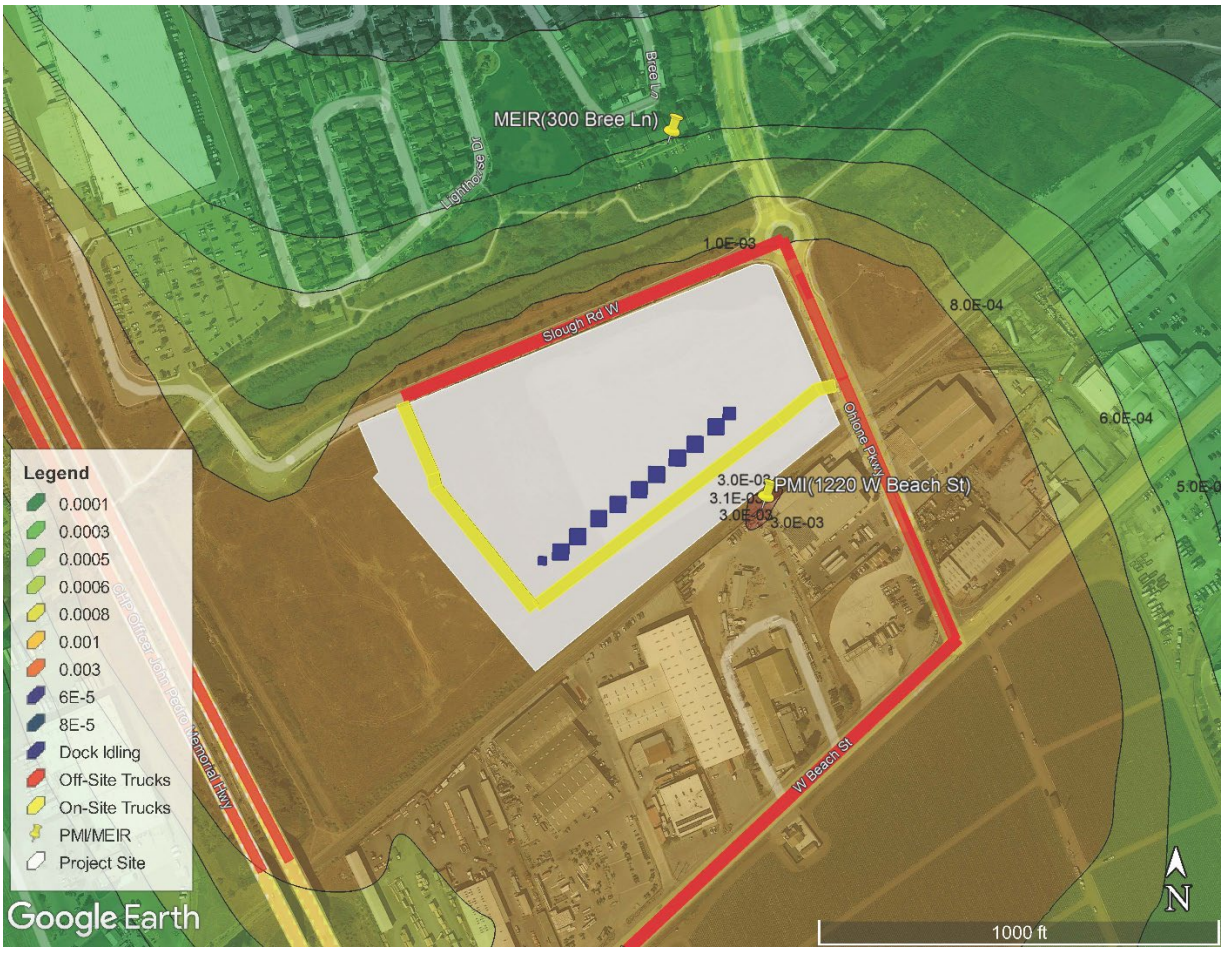
(C) The Year 2 concentration at the MEIR location includes emissions from both construction and operational activities. The Year 2 concentration at the MEIR was calculated by multiplying the operational concentration in Year 3-30 by the percent of the year that operation occurs in Year 2 and adding that Year 2 operational concentration to the Year 2 construction concentration. The construction DPM concentration for Year 2 was 0.01524 µg/m^3. The operational DPM contribution during Year 2 was estimated to be approximately 0.00030 µg/m^3, which reflects the remaining approximately seven (7) months during the Year 2 that the Project could be operational.

Figure 17: Modeled Construction DPM Concentrations

Source: MIG, 2023 (see Appendix A)

The HRA evaluated worst-case carcinogenic and non-carcinogenic risks assuming a 30-year exposure duration starting in each child (3rd trimester, 0-2 years, and 2-16 years) and adult (16-30 years and 30-70 years) age group recommended by OEHHA. Table 3.3-6 summarizes the results of the construction and operational HRA.

Figure 18: Modeled Operational DPM Concentrations



Source: MIG, 2023 (see Appendix A)

As shown in Table 3.3-6, the calculated excess cancer risks are greatest for child receptors; in particular, child receptors less than two years of age at the start of construction activities. The calculated excess individual cancer risk for this subset of the population is 0.79 per 100,000 population (or 7.9 per million population), respectively, which is below the MBARD-recommended significance threshold value of 1.0 excess cancers per 100,000 population (see Appendix A for all HRA results). At the same DPM concentrations, risks to children in the 3rd trimester would be approximately seven-tenths of the MBARD-recommended significance threshold, risks to children ages 2-16 would be approximately one-seventh the MBARD-recommended significance threshold, and risks to adult receptors would be less than one one-twentieth of the BAAQMD-recommended threshold. The magnitude of the project's predicted cancer risks at sensitive residential receptors is primarily a function of the magnitude of the project's DPM emissions levels and the distance between modeled DPM emissions sources (e.g., construction equipment, idling trucks, etc.) and the MEIR location, which is approximately 700 feet away from the center of the project site, and at least 320 feet away from the project's closest DPM emissions source (truck travel on Manabe Ow Road). Since the proposed project would not expose any receptors to cancer health risks in excess of the MBARD's recommended threshold, this impact would be less than significant.

Table 3.3-6: Summary of MEIR Excess Cancer Risk					
Exposure Year	***MEIR Excess Cancer Risk Estimate by Life Stage and Age at Receptor's 1st Year of Exposure***				
	Infant	***Child < 2 Years***	***Child 2-16 Years***	***Adult 16-30 Years***	***Adult 30-70 Years***
Year 1 (Construction)	0.48	0.57	0.09	0.01	0.01
Year 2 (Construction)	0.19	0.19	0.03	0.00	0.00
Year 2 (Operation)	0.02	0.02	0.02	0.00	0.00
Year 3 – 30 (Operation)	0.00	0.00	0.00	0.00	0.00
Total Excess Risk per 100,000 Population	0.69	0.79	0.14	0.02	0.02
MBARD Threshold	**1**	**1**	**1**	**1**	**1**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**
Source: MIG, 2023 (see Appendix A)					

Non-Carcinogenic Health Hazard from Exposure to DPM

As shown in Table 3.3-4, the maximum annual average DPM concentration at any receptor location would be approximately 0.0350 µg/m3, which would occur at the MEIR location during Year 1 construction activities. Based on the chronic inhalation REL for DPM (5 µg/m3), the calculated chronic hazard quotient during the maximum exposure to DPM concentration would be 0.007, which is below the MBARD's non-cancer hazard index threshold value of 1.0. The project, therefore, would not result in significant non-carcinogenic health risks to receptors from DPM exposure. This impact would be less than significant.

Criteria Air Pollutant Exposure

As described in Section 3.3.1, both the U.S. EPA and CARB regulate common air pollutants on the basis of human health and/or environmental criteria, with the most commonly regulated air pollutants including NOx, PM, CO, etc., which can cause adverse human health effects. The MBARD's regional CEQA criteria air pollutant thresholds of significance were designed to achieve and maintain air quality attainment status in the NCCAB. Criteria air pollutant emissions from projects that do not exceed MBARD's construction and operational regional CEQA criteria air

pollutant thresholds, such as the proposed project, would not expose sensitive receptors to substantial criteria air pollutant concentrations. This impact would be less than significant.

Carbon Monoxide Hotspots

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near high volume intersections (tens of thousands of vehicles per hour). The project would generate a total of 316 total daily trips, including 45 total AM peak hour trips and 48 total PM peak hour trips. This additional project traffic would not generate a CO hotspot, as there are no high-volume intersections in the immediate vicinity of the project site. According to the TIS prepared for the project, the addition of project traffic to the local roadway system: 1) would not cause intersections or road segments that operate at level of service (LOS) LOS D or better to deteriorate to LOS E or F; 2) would not cause intersections or road segments that operate at LOS E or F to increase volume-to-capacity ratios by 0.5 or more or increase delay by 10 seconds or more; 3) would not cause unsignalized intersections which operate at LOS E or F to decrease reserve capacity by 50% or more; and 4) would not generate substantial traffic, including heavy duty truck traffic, along urban street canyons or near a major stationary source of CO. The proposed project, therefore, would not result in significant CO concentrations pursuant to MBARD-recommended methodologies for evaluating CO hotspots (MBARD, 2008, page 5-8).

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The project would generate typical odors associated with construction activities, such as vehicle exhaust odors. The odors generated by the project would be intermittent and localized in nature and would disperse quickly. The project would not generate substantial odors from the operation of the proposed industrial warehouse building. Therefore, the project would not create emissions or odors that adversely affect a substantial number of people. This impact would be less than significant.

3.3.4 References

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3.4 BIOLOGICAL RESOURCES

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

The following discussion and analyses are based in part on a Biological Resources Report and Update prepared for the project by MIG. A copy of the report, dated April 2022, and Update dated May 2023, is included in Appendix B.

3.4.1 Environmental Setting

Field surveys of the project area were conducted by MIG senior biologist David Gallagher, M.S. on March 10, 2022. The surveys were conducted to provide an impact assessment for the proposed development of the subject project site as well as the adjacent proposed development site at 200 Manabe Ow Road. Surveys were conducted to (1) assess existing biotic habitats and plant and animal communities in the project area, (2) assess the project area for its potential to

support special-status species and their habitats, and (3) identify potential jurisdictional habitats (e.g., waters of the U.S./state), and other sensitive biological resources. A separate field survey of the proposed soil stockpile site located on the east side of Ohlone Parkway was conducted by MIG biologist Kim Briones on May 1, 2023. A copy of the assessment based on her field survey is included in Appendix B.

General Project Area Description

The project site is adjacent to Manabe Ow Road and Ohlone Parkway in Watsonville, Santa Cruz County, California and is on the Watsonville West USGS quadrangle. The project area is located within an urbanized area Industrial Park and is within the Manabe-Ow Business Park Specific Plan area. Grading activities and placement of fill on the project site during the past several years have removed much of the native vegetation in the center of the site. However, portions of the Project site have been recolonized by grassland habitat.

The project is located within an urban area, which includes both residential and commercial development, approximately one mile west of the Watsonville downtown area. Agricultural lands are also nearby to the south and west. The project site is bordered by vacant land to the west, railroad tracks to the south, Manabe Ow Road to the north and Ohlone Parkway to the east. Watsonville Slough is located just north of Manabe Ow Road. The project site is mainly flat and was used for agriculture as recently as 2015 (Google Inc. 2022).

The climate is coastal Mediterranean, with most rain falling in the winter and spring. Mild cool temperatures are common in the winter and mild to cool temperatures are common in the summer due to the presence of fog. Climate conditions in the area include a 30-year average of approximately 22 inches of annual precipitation with an average temperature range from 47ºF to 68ºF (PRISM Climate Group 2022).

The National Resource Conservation Service (NRCS) maps two soil types within the project area: (1) Clear Lake clay, drained, 0 to 1 percent slopes, MLRA 14; and (2) Conejo clay loam, 0 to 2 percent slopes, cool, MLRA 14. The Clear Lake clay series is found in alluvial basins. The water table depth for this series is 36 to 72 inches and has slow permeability. The Conejo clay loam series is found in alluvial fans and plains. The water table depth for this series is 60 inches and has moderate permeability. The Clear Lake clay soil type is classified as a hydric soil in Santa Cruz County on the National Hydric Soils List.

The U.S. Fish and Wildlife Service's National Wetlands Inventory (NWI) maps Watsonville Slough as a permanently flooded, perennial riverine feature with a streambed.

Proposed Soil Stockpile Site

The proposed soil stockpile site is located on an adjacent parcel (APN 018-711-13) on Ohlone Parkway to the east (Figure 2). Due to its proximity to the project site, conditions on the stockpile site are similar to the project site, in that it is surrounded by residential and industrial development and is in the vicinity of agricultural lands. The stockpile site is mainly flat but supports some areas of former fill on the western portion of the site. The stockpile site was used for agricultural purposes until 2007 and received imported fill on several occasions between 2014 and 2017, but has been mostly undisturbed since 2017 (Google Inc. 2022). Soils on the stockpile are composed

of Conejo clay loam, 0 to 2 percent slopes, cool, MLRA 14, which also occur in the Project area (NRCS 2023).

Existing Land Uses, Vegetation Communities, and Habitats

The project is located within the Central Coast Subregion of the Central Western Californian Region, both of which are contained within the larger California Floristic Province (Baldwin et al. 2012). Where applicable, vegetation communities were mapped using CDFW's Vegetation Classification and Mapping Program's currently accepted list of vegetation alliances and associations. The reconnaissance-level field survey identified the project site as "Developed".

The entire 100 Manabe Ow Road project area was originally mapped as developed due to sparse vegetation cover, and recent grading and disking of the site. However, during the recent biological survey on May 1, existing conditions on a portion of the project site have changed. The southern and northeastern portion of the site has not changed – it is devoid of vegetation but is sparsely vegetated with non-native herbaceous species (See Appendix B Biological Resources Report section 5.2.2 for a list of plant species observed and Appendix C, Photo 1 to that report). However, the central and western portions, and part of the northern portion of the site have become densely vegetated with grasses and forbs (see Appendix B Biological Resources Report Update pg. 2 for a revised list of species observed in vegetated portions of the site, Figure 2, and pg. 10 Photos 3 and 4 in that report). Because the vegetation in this area is comprised of many of the same species as the adjacent 200 Manabe Ow Road project site, this area is similarly characterized as Wild Oats and Annual Brome Grassland. No sensitive or jurisdictional habitats (e.g., wetlands) are present on the project site.

Without frequent grading or disking, the remainder of the developed land cover in the Manabe 100 Ow project area will likely revert to the Wild Oats and Annual Brome Grassland vegetation community found on the western and central portion, and parts of the northern portion of the site and in the adjacent 200 Manabe Ow project area.

Due to the scarcity of vegetation in the unvegetated areas of the developed land cover, this area provides relatively low-quality habitat for wildlife species. However, a wide variety of wildlife, including the wildlife described below, may move through developed areas and more vegetated areas of the project site en route to other habitats, especially since the developed areas are near Watsonville Slough and its riparian corridor. The wildlife most often associated with developed areas are those that are tolerant of human disturbance, including introduced species such as the house sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), rock pigeon (*Columba livia*), house mouse (Mus musculus), and Norway rat (*Rattus norvegicus*). Several common native species are also able to use this habitat, including raccoon (*Procyon lotor*), Anna's hummingbird (*Calypte anna*), dark-eyed junco (*Junco hyemalis*), house finch (*Haemorhous mexicanus*), and California towhee (*Melozone crissalis*).

Various wildlife species may occupy or utilize more vegetated areas of the project site include foraging raptors such as the white-tailed kite (*Elanus leucurus*) and red-tailed hawk (*Buteo jamaicensis*), ground-nesting birds, western fence lizards, and gopher snake (*Pituophis catenifer*). Small numbers of burrows, likely of California vole (*Microtus californicus*), were observed in the vegetated portion of the site and these species also breed on the site.

Proposed Soil Stockpile Site

The proposed soil stockpile area and associated access route contain wild oats and annual brome grassland and developed landcover (see Appendix B Biological Resources Report Update, Figure 2, pg. 2 for a list of plant species observed, and pg. 9 Photos 1 and 2). Dominant plant species observed within the wild oats and annual grassland include wild oats (*Avena* sp.), wild radish (*Raphanus sativus*), ripgut brome (*Bromus diandrus*), and Italian rye grass (*Festuca perennis*). Other species observed include bristly ox tongue (*Helminthotheca echiodes*), vetch (*Vinca* sp.), and Italian thistle *(Carduus pycnocephalus*). The developed portion of the stockpile area consists of a compact gravel road, which enters the site from Ohlone Way. This road borders the entire southern portion of the parcel. The road is approximately 15 feet wide but widens to approximately 80 feet for a short distance where it has not been colonized by vegetation. No sensitive or jurisdictional habitats (e.g., wetlands) are present on the site.

Native wildlife species that were observed in the grassland habitat that may breed and forage on the site include song sparrow (*Melospiza melodia*), red-winged blackbird (*Agelaius phoeniceus*), western fence lizard (*Sceloporus occidentalis*), gopher snake (*Pituophis catenifer*), and various bumble bee species (*Bombus* sp.). Based on the presence of small numbers of burrows in the grassland area, the site may also support breeding and foraging California vole. No wildlife species were observed in the gravel areas during the survey, but killdeer (*Charadrius vociferus*) may nest in open areas such as this.

Watsonville Slough

The Watsonville Slough watershed drains 14 square miles from the hills of southern Santa Cruz County into the Pajaro River and Monterey Bay. One of the last remaining large coastal freshwater ecosystems in California, the Watsonville Slough includes approximately 800 acres of freshwater marsh, seasonal wetland, estuarine, and riparian habitat with six major slough branches, including Watsonville Slough, Harkins Slough, Gallighan Slough, Hanson Slough, the main branch of the Struve Slough, and the western branch of Struve Slough (Hager et al. 2004).

Sensitive Habitats and Aquatic Features

All plant communities observed in the project area were evaluated to determine if they are considered sensitive. Sensitive natural communities are communities that are especially diverse; regionally uncommon; or of special concern to local, state, and federal agencies. Elimination or substantial degradation of these communities would constitute a significant impact under CEQA.

The project area was also inspected for the presence of wetlands, drainages, streams, coastal waterways, and other aquatic features, including those that support stream-dependent (i.e., riparian) plant species that could be subject to jurisdiction by the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and/or the California Department of Fish and Wildlife (CDFW). Wetlands are defined for regulatory purposes in the 33 CFR 328.3 and 40 CFR 230.3 as “areas inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal conditions do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” To be considered subject to federal jurisdiction, a wetland must be located within the project area and normally exhibit positive indicators for hydrophytic vegetation, hydric soil, and wetland hydrology.

Special-Status Species Habitat Evaluation

During the field survey, the MIG biologist evaluated the suitability of the habitat to support special-status species documented in the project area. For the purposes of this assessment, special-status species include those plants and animals listed, proposed for listing or candidates for listing as threatened or endangered by the United States Fish and Wildlife Service (USFWS) or the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) under the Federal Endangered Species Act (FESA), those listed or proposed for listing as rare, threatened or endangered by the CDFW under the California Endangered Species Act (CESA), animals designated as California Fully Protected Species (CFP) or California Species of Special Concern (CSSC) by CDFW, birds protected by USFWS under the Migratory Bird Treaty Act (MBTA) and/or by CDFW under Fish and Game Code Sections 3503 and 3513, and plants listed as Rank 1A, 1B, 2, 3 and 4 in the California Native Plant Society (CNPS) Inventory.

The potential occurrence of special-status plant and animal species in the project area was initially evaluated by developing a list of special-status species that are known to or have the potential to occur in the vicinity of the project area based on an eight-quad search of current database records (e.g., CNDDB and CNPS Electronic Inventory records) and review of the USFWS list of federal endangered and threatened species (i.e., IPaC). The potential for occurrence of those species included on the eight-quad list was then evaluated based on the habitat requirements of each species relative to the habitat conditions documented in the project area. If there are no documented occurrences within five miles of the project area, if there is clearly no suitable habitat present, and if the project area is clearly outside of the expected range of the species, these species were eliminated from consideration and were not discussed further. All remaining species were then evaluated for the potential to occur on or in the immediate vicinity of the project area according to the following criteria:

> *Not Expected:* CNDDB or other documents do not record the occurrence of the species within or reasonably near the project area within the last 10 years, and/or no components of suitable habitat are present within or adjacent to the project area.
>
> *Low Potential:* The CNDDB or other documents may or may not record the occurrence of the species within a 5-mile radius of the project area. However, few components of suitable habitat are present within or adjacent to the project area.
>
> *Moderate Potential*: Species does not meet all terms of High or Low category. For example: CNDDB or other reputable documents may record the occurrence of the species near but beyond a 5-mile radius of the project area, or some of the components representing suitable habitat are present within or adjacent to the project area, but the habitat is substantially degraded or fragmented.
>
> *High Potential:* The CNDDB or other reputable documents record the occurrence of the species off-site, but within a 5-mile radius of the project area and within the last 10 years. All or most of the components representing suitable habitat are present within the project area.
>
> *Present or Assumed Present*: Species was observed on the project area, or recent species records (within five years) from literature or other sources are known within the project area.

Special-Status Plants

The CNPS Inventory (2022) and CNDDB (2022) identify 70 special-status plant species as potentially occurring in the nine 7.5-minute quadrangles containing and/or surrounding the project area. All but one of the 70 potentially occurring special-status plant species were determined to be absent from the project area for at least one of the following reasons: (1) a lack of specific habitat (e.g., estuarine marsh) and/or edaphic requirements (e.g., serpentine soils) for the species in question, (2) the geographic range of the species does not overlap the project area, (3) the species is known to be extirpated from the site vicinity, and/or (4) the habitats within the project area are too degraded to reasonably expect any special-status species to occur due to the long history (at least 75 years based on aerial imagery) of agricultural use of the site (UCSB 2022). Plowing, tilling, and other land disturbance associated with agriculture at the site has likely eliminated most soil seed banks of native plants.

Based on suitable grassland habitat, hydric clay soils, and documented nearby locations, Santa Cruz tarplant (*Holocarpha macradenia*) has a moderate potential to occur within the adjacent 200 Manabe Ow Road project site. However, there was no suitable habitat for Santa Cruz tarplant in the 100 Manabe Ow Road project site or the proposed soil stockpile site due to the lack of grassland habitat and hydric soils.

Special-Status Animals

Based on a review of the USFWS and CNDDB databases, the biologist's knowledge of sensitive species, and an assessment of the types of habitats within the project site, it was determined that three special-status wildlife species have a moderate potential to occur within or near the project site and proposed soil stockpile site. This determination was made due to the presence of essential habitat requirements for the species, the presence of known occurrences within five miles of the project area, and/or the project area location within the species' known range of distribution. The legal status and likelihood of occurrence of special-status animal species in the project area is presented in Table 3.4-1 and discussed in greater detail below.

Table 3.4-1: Special-Status Species with Potential to Occur in the Project Area

Common Name	*Regulatory Status*	*Likelihood of Occurrence in the 100 Manabe Ow Road Project Site*
Plants		
Santa Cruz Tarplant	FT, SE, CRPR 1B.1	Not Expected
Invertebrates		
Crotch bumble bee	SC	Moderate
Fish		
Pacific Lamprey	CSSC	Not Expected
Tidewater Goby	FE	Not Expected
South-central California Coast Steelhead DPS	FT	Not Expected
Amphibians and Reptiles		
California red-legged Frog	FT, CSSC	Moderate
Western Pond Turtle	CSSC	Moderate
Mammals		
San Francisco dusky-footed woodrat	CSSC	Not Expected
Birds		
American Peregrine Falcon	FP	Not Expected (nesting); may forage in the area
Burrowing Owl	CSSC	Not Expected (nesting); may forage in the area
Northern harrier	CSSC (nesting)	Not Expected (nesting); may forage in the area
Tricolored Blackbird	ST (nesting)	Not Expected (nesting); may forage in the area
White-tailed Kite	FP	Not Expected (nesting); may forage in the area
Yellow Warbler	CSSC (nesting)	Not Expected (nesting); may forage in the area

Key to Status Abbreviations: Federally Listed as Endangered (FE); Federally Listed as Threatened (FT); Federal Candidate for Listing (FC), Federal Species of Concern (FSC), State Listed as Endangered (SE); State Listed as Threatened (ST); State Candidate for Listing (SC); State Fully Protected (FP); California Species of Special Concern (CSSC), State Candidate for listing under CESA (SC)

CRPR = California Native Plant Society Rare Plant Rank
- 1B = Plants that are rare, threatened, or endangered in California and elsewhere
- 2B = Plants rare, threatened, or endangered in California but more common elsewhere
- 3 = Plants about which information is needed-a review list
- 4 = A watch list of plants of limited distribution
- 0.1: Seriously endangered in California
- 0.2: Fairly endangered in California
- 0.3: Not very endangered in California

Special-status species that are not expected to occur in the project areas because they lack suitable habitat, are outside the known range of the species, and/or are isolated from the nearest known extant populations by development or otherwise unsuitable habitat were excluded from the analysis.

Animal species not expected to occur in the project area for these reasons include Monterey Hitch (*Lavinia exilicauda harengus*), monarch butterfly (*Danaus plexippus*), California giant salamander (*Dicamptodon ensatus)*, California tiger salamander (*Ambystoma californiense*), foothill yellow-legged frog (*Rana boylii*), Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*), black legless lizard (*Anniella pulchra nigra*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), short-eared owl (*Asio flammeus*), and long-eared owl (*Asio otus*).

Special-Status Invertebrates

Crotch Bumble Bee (*Bombus crotchii*). Federal status: None; State status: Candidate for Listing under the CESA. As of May 2022, the Crotch bumble bee is a candidate for listing under the CESA. The Crotch bumble bee occurs from coastal California east to the Sierra-Cascade crest (Koch et al. 2012). This species is a generalist forager and occurs in grassland and scrub habitats containing abundant floral resources and small mammal burrows. The species nests underground, primarily in abandoned small mammal burrows (e.g., California vole), but may also nest under perennial bunch grasses, or thatched annual grasses, underbrush piles, in old bird nests, and in dead trees or hollow logs (Williams et al 2014, Hatfield et al. 2015). Active nests of bumble bees typically support between 50 to 500 individuals. Queens overwinter in soft soils, or under leaf litter or other debris (Goulson 2010, Williams et al. 2014). The species has experienced large population declines in the last 10 years (Xerces Society et al. 2018). There are three occurrences of the crotch bumble bee in Santa Cruz County from the mid-1990s. These occurrences are within approximately 2, 3, and 15 miles of the site (CNDDB 2023). This species was also observed in 2022 approximately 15 miles northeast of the site (Xerces Society et al. 2023).

Although a majority of the flowering species within the stockpile area and project site are non-native species, the Crotch bumble bee will forage on a variety of flowering species, including non-native species, because it is a generalist forager. Based on the presence of abundant floral resources, small mammal burrows (likely California voles), and because the site is within their known range, there is a moderate potential for the Crotch bumble bee to occur within Project site and stockpile area.

Special-Status Amphibians

California Red-legged Frog *(Rana draytonii)*. Federal status: Threatened; State status: Species of Special Concern. The California red-legged frog was federally listed as threatened in June 1996 (USFWS 1996) based largely on a significant range reduction and continued threats to surviving populations. Critical habitat was most recently designated in March 2010 (USFWS 2010). Designated critical habitat is not present in the project area. The historical distribution of the California red-legged frog extended from the city of Redding in the Central Valley and Point Reyes National Seashore along the coast, south to Baja California, Mexico. The species' current distribution includes isolated locations in the Sierra Nevada and the San Francisco Bay Area, and along the central coast (USFWS 2002a).

The California red-legged frog inhabits freshwater pools, streams, and ponds throughout the Central California Coast Range and isolated portions of the western slope of the Sierra Nevada (Fellers 2005). Its preferred breeding habitat consists of deep perennial pools with emergent vegetation for attaching egg clusters (Fellers 2005), as well as shallow benches to act as nurseries

for juveniles (Jennings and Hayes 1994). However, red-legged frogs will also breed in small, shallow pools as well as intermittent streams. Non-breeding frogs may be found adjacent to streams and ponds and may travel up to two miles from their breeding locations across a variety of upland habitats to other suitable non-breeding habitats (Bulger et al. 2003; Fellers and Kleeman 2007). However, the distance moved is highly site-dependent and is influenced by the local landscape (Fellers and Kleeman 2007). California red-legged frogs generally disperse during the wet season from mid-October to mid-April.

The Manabe-Ow Business Park Specific Plan Draft Master Environmental Impact Report (MEIR) identified the 100 and 200 Manabe Ow Road project areas as active agricultural fields with no habitat value for red-legged frog, and the drainage channel was not identified as an aquatic feature (RBF Consulting 2010). Site conditions have changed significantly since the preparation of the MEIR in 2010 and there is currently suitable habitat for California red-legged frog in the 200 Manabe Ow Road and 100 Manabe Ow Road project areas. Additionally, California red-legged frog is well documented from the marsh complex formed by the confluence of Watsonville, Struve, and Hanson Sloughs (CNDDB 2022), approximately 0.3 mile downstream of the project area.

The section of Watsonville Slough adjacent to the 200 Manabe Ow Road project area and the existing Cattail Marsh along the western edge of that site provide suitable foraging and dispersal habitat. At the time of the site visit, the Cattail Marsh did not provide high quality breeding habitat due to low water levels. However, the Cattail Marsh may provide potential breeding habitat for red-legged frog (i.e., a slow-moving stream with emergent vegetation for egg mass attachment) in years with higher water levels (red-legged frogs are known to breed in one foot of water with dense vegetation cover). Additionally, the grassland habitat in the 200 Manabe Ow Road project area provides upland dispersal and refugia habitat (i.e., low density of small mammal burrows). Although grading and site disturbance has occurred on the 100 Manabe Ow Road project site, patchy to densely vegetated areas within the western portion of the site also provide potential upland dispersal and refugia habitat for the California red-legged frog. Likewise, due to its' proximity to Watsonville Slough and the presence of grassland habitat and small mammal burrows (likely California vole) the soil stockpile site also supports potential upland dispersal and aestivation habitat for the species.

Special-Status Reptiles

Western Pond Turtle (*Actinemys marmorata*). Federal status: None; State status: Species of Special Concern. The western pond turtle occurs in ponds, streams, and other wetland habitats in the Pacific slope drainages of California (Bury and Germano 2008). Ponds or slack-water pools with suitable basking sites (such as logs) are an important habitat component for this species, and western pond turtles do not occur commonly along high-gradient streams. Females lay eggs in upland habitats, in clay or silty soils in unshaded areas. Juveniles occur in shallow aquatic habitats with emergent vegetation and ample invertebrate prey. Nesting habitat is typically found within 600 feet of aquatic habitat (Jennings and Hayes 1994), but if no suitable nesting habitat can be found close by, adults may travel overland considerable distances to nest.

The Manabe-Ow Business Park Specific Plan MEIR identified the neighboring property at 200 Manabe Ow Road as an active agricultural field with no habitat value for western pond turtle, and the adjacent drainage channel was not identified as an aquatic feature (RBF Consulting 2010). Site conditions have changed significantly since the preparation of the MEIR in 2010 and there is currently suitable habitat for western pond turtle on the 200 Manabe Ow Road site.

There are documented occurrences for western pond turtle from the Pajaro River, Struve Slough, and the lower reach of Watsonville Slough with the most recent occurrences from 2007 (CNDDB 2022). The Watsonville Slough within the Specific Plan area as well as the Cattail Marsh adjacent to 200 Manabe Ow Road provide suitable aquatic habitat for western pond turtle (i.e., perennial slow-moving stream with substantial emergent vegetation and basking sites). Although grading and site disturbance has occurred on the 100 Manabe Ow Road project site, patchy to densely vegetated areas within the western portion of the site provide potential upland dispersal and nesting habitat for the western pond turtle.

Special Status Mammals

San Francisco Dusky-footed Woodrat (*Neotoma fuscipes annectens*). Federal status: None; State status: Species of Special Concern. The San Francisco dusky-footed woodrat occurs in a variety of woodland and scrub habitats throughout San Mateo County and the adjacent Central Coast Range, south to the Pajaro River in Monterey County (Hall 1981, Zeiner et al. 1990). San Francisco dusky-footed woodrats prefer riparian and oak woodland forests with dense understory cover, or thick chaparral habitat, and build large, complex houses of sticks and other woody debris, which may be maintained by a series of occupants for several generations (Carraway and Verts 1991; Lee and Tietje 2005). Also, they will often build these stick houses in the canopies of trees. Woodrats also use human-made structures, and can nest in electrical boxes, sheds, pipes, abandoned vehicles, wooden pallets, and portable storage containers. The breeding season for dusky-footed woodrat begins in February and sometimes continues through September, with females bearing a single brood of one to four young per year (Carraway and Verts 1991).

There is no suitable habitat for dusky-footed woodrat within the project area, including along the Cattail Marsh, and no woodrat houses were observed during the field survey. However, San Francisco dusky-footed woodrat could occur in the riparian habitat along the section of Watsonville Slough adjacent to the project area. Since the riparian habitat along the Watsonville Slough is at least 80 feet away from the project area, project activities are not expected to impact San Francisco dusky-footed woodrat.

Bat Colonies

Bats tend to forage and roost near freshwater sources. Both the Watsonville Slough, north of the project site, and the Cattail Marsh, adjacent to the 200 Manabe Ow Road site, provide a seasonal source of freshwater. Cavities within trees, culverts, buildings, and other structures may provide suitable day and maternity roost habitat for many species of bats.

Roost sites play a critical role in mating, hibernation, rearing young, conserving energy, and protection from adverse weather and predators. Selection of roost sites is influenced by distribution and abundance of food resources, risks of predation, as well as the physical attributes of the roost itself. Roost selection is paramount to the success of a species and the removal of roost habitat could adversely impact the survivorship of a species (Kunz 1982).

Depending upon species, maternity roosts can host from a few to thousands of reproductive female bats that congregate during spring and summer months to give birth and nurse their young. In California, maternity roosts may remain active from April through August. As a potentially uncommon and limited resource, maternity roosts may be the limiting resource for a local

population of bats, and thus may be essential to the survival of a local bat population. Maternity roosts tend to have sensitivity to disturbance, with documented instances of abandonment even during the presence of flightless young. As bats have a low reproductive rate of typically one pup per year, negative impacts to maternity roosts can have profound impacts on a local population of bats (Szewczak 2013).

The CDFW is the primary agency responsible for the conservation of bats in California, with 12 species of bats being designated as CSSC by CDFW. The primary regulatory mechanism applicable to bats is CEQA, which requires an analysis of a project's effects on the environment, including biological resources such as bats. Disturbance of roosting habitat of any bat species would be considered significant under CEQA. No suitable tree cavities or other roosting habitat was observed at 100 Manabe Ow Road or within 50 feet of the project area. However, roosting bats could be present in the riparian habitat along the section of Watsonville Slough across the street from the project site. Since the riparian habitat along the Watsonville Slough is at least 80 feet away from the project area, project activities are not expected to impact roosting bats.
Special-status Birds

American Peregrine Falcon (*Falco peregrinus anatum*). Federal Listing Status: None; State Listing Status: Fully Protected. The American peregrine falcon occurs throughout much of the world and is known as one of the fastest flying birds of prey. Peregrine falcons prey almost entirely on birds, which they kill while in flight. These falcons nest on ledges and caves on steep cliffs, as well as on human-made structures such as buildings, bridges, and electrical transmission towers. In California, they are known to nest along the entire California coastline, and the Cascade Ranges and Sierra Nevada.

A severe decline in populations of the widespread North American subspecies *anatum* began in the late 1940s. This decline was attributed to the accumulation of DDE, a metabolite of the organochlorine pesticide DDT, in aquatic food chains. When concentrated in the bodies of predatory birds such as the peregrine falcon, this contaminant led to reproductive effects, such as the thinning of eggshells. The American peregrine falcon was listed as endangered by the USFWS in 1970 (USFWS 1970) and by the State of California in 1971. Recovery efforts included the banning of DDT in North America, and captive breeding programs to help bolster populations. The USFWS removed the American peregrine falcon from the endangered species list in 1999 (USFWS 1999), and it was removed from the state endangered species list in 2009.

There is no suitable nesting habitat within or adjacent to the project area. However, peregrines nesting elsewhere in the project region, as well as migrants and wintering birds, may occasionally forage in the project area. Peregrine falcons have been observed along the Watsonville Slough near the project area (Cornell Lab of Ornithology 2022).

Burrowing Owl (*Athene cunicularia*). Federal Listing Status: None; State Listing Status: Species of Special Concern. Burrowing owls occur year-round in Santa Cruz County, using open, agricultural or grassland areas with active small mammal burrows, which they use for nesting and roosting. Typical burrowing owl habitat is treeless with minimal shrub cover, woody plant encroachment, and low density and foliage height diversity. In the San Francisco Bay Area, burrowing owls are chiefly associated with burrows of California ground squirrels, whose burrows provide nesting and roosting cavities. In the absence of ground squirrel populations, habitats soon become unsuitable for occupancy by owls (Plumpton and Lutz 1993).

The burrowing owl nesting season as recognized by the CDFW runs from February 1 through August 31. After nesting is completed, adult owls may remain in their nesting burrows or in nearby burrows, or they may migrate and over-winter elsewhere (Gorman et al. 2003). Young birds disperse across the landscape from 0.1 mile to 35 miles from their natal burrows (Rosier et al. 2006). Philopatry (the tendency for individuals to breed at or near their place of birth), site tenacity (the tendency for individuals to breed at or near their prior nest location), and nest burrow reuse have been well documented for burrowing owls (Plumpton and Lutz 1993a), and burrowing owls may return to a nesting site and attempt to nest even after the site has been developed.

There are several documented occurrences within one mile of the project area (Cornell Lab of Ornithology 2022). There is no potential breeding habitat within the project site or soil stockpile site due to the lack of California ground squirrels and their burrows. Although small numbers of other small mammal burrows are present on the Project site and soil stockpile site, these burrows are not large enough to support burrowing owls. Burrowing owls are not expected to occur at the project site or the soil stockpile site, however they may forage in the area.

Northern Harrier (*Circus cyaneus*). Federal Listing Status: None; State Listing Status: Species of Special Concern (Nesting). The northern harrier nests in marshes and grasslands with tall vegetation and sufficient moisture to inhibit accessibility of nest sites to predators. This species forages primarily on small mammals and birds in a variety of open grassland, ruderal, and agricultural habitats. Northern harriers forage in a variety of open habitats, especially during the nonbreeding season. The species is widespread as a forager in grasslands, extensive wetlands, and agricultural areas in the project region during migration and winter. Northern harriers are not expected to nest on the project area due to a lack of suitable habitat. However, harriers may nest in nearby marsh habitats along the Watsonville Slough downstream of the project area and forage in the project area.

Tricolored Blackbird (*Agelaius tricolor*). Federal Listing Status: None; State Listing Status: Threatened (Nesting Colony). Tricolored blackbird was listed as a threatened species by the California Fish and Game Commission on April 19, 2018. Tricolored blackbirds are found primarily in the Central Valley and in the central and southern coastal areas of California. The tricolored blackbird is highly colonial in its nesting habits, and forms dense nesting colonies that, in some parts of the Central Valley, may consist of up to tens of thousands of pairs. Suitable tricolored blackbird nesting habitat includes flooded stands of tall and dense, thorny, or spiny vegetation dominated by cattails (*Typha* spp.) or bulrushes (*Schoenoplectus* spp.), and willows (*Salix* spp.), but also will nest in dense stands of blackberry bushes (*Rubus* spp.) and wild rose (*Rosa* spp.) bushes, as well as thistles (*Cirsium* and *Centaurea* spp.) and nettles (*Urtica* spp.), usually near extensive open areas such as marshes, grassland, or agricultural land that provide foraging habitat. Nesting colonies are usually located near fresh water. Tricolored blackbirds form large, often multi-species flocks during the nonbreeding period and range more widely than during the nesting season. Preferred foraging habitats include crops such as rice, alfalfa, irrigated pastures, and ripening or cut grain fields (e.g., oats, wheat, silage), as well as annual grasslands, cattle feedlots, and dairies (Shuford and Gardali 2008). These blackbirds also forage in remnant native habitats, including wet and dry vernal pools and other seasonal wetlands, riparian scrub habitats, and open marsh borders.

Even though the Cattail Marsh adjacent to the neighboring property at 200 Manabe Ow Road consists of dense stands of cattails, the small size of the marsh likely precludes nesting tri-colored blackbirds. Tricolored blackbirds are well documented from the marsh complex formed by the

confluence of Watsonville, Struve, and Hanson Sloughs, approximately 0.3 mile from the project area (CNDDB 2022, Cornell Lab of Ornithology 2022). Therefore, tricolored blackbirds may forage in the project area and/or migrate through the project area but are not expected to nest in the project area.

White-tailed Kite (*Elanus leucurus*). Federal Listing Status: None; State Listing Status: Fully Protected. In California, white-tailed kites can be found in the Central Valley and along the coast in grasslands, agricultural fields, cismontane woodlands, and other open habitats (Zeiner et al. 1990a, Dunk 1995, Erichsen et al. 1996). White-tailed kites are year-round residents of the state, establishing nesting territories that encompass open areas with healthy prey populations and snags, shrubs, trees, or other substrates for nesting (Dunk 1995). Nonbreeding birds typically remain in the same area over the winter, although some movements do occur (Polite 1990). The presence of white-tailed kites is closely tied to the presence of prey species, particularly voles, and prey base may be the most important factor in determining habitat quality for white-tailed kites (Dunk and Cooper 1994, Skonieczny and Dunk 1997). Although the species recovered after population declines during the early 20th century, its populations may be exhibiting new declines because of recent increases in habitat loss and disturbance (Dunk 1995, Erichsen et al. 1996).

White-tailed kites are common residents in the vicinity of the project area where open grassland and agricultural habitats are present (Cornell Lab of Ornithology 2022). Two individuals were observed in the 200 Manabe Ow Road project area in 2019 (Cornell Lab of Ornithology 2022) which is adjacent to the 100 Manabe Ow project area. There is no suitable nesting habitat within the project area, but there may be suitable nesting habitat in the riparian corridor along Watsonville Slough across the street from the proposed project. However, since the riparian habitat along the Watsonville Slough is at least 80 feet away from the project, project activities are not expected to impact nesting kites.

Yellow Warbler (*Setophaga petechia*). Federal Listing Status: None; State Listing Status: Species of Special Concern. In California, the yellow warbler occupies wooded riparian habitats (Heath 2008). This species prefers riparian corridors with an overstory of mature cottonwoods and sycamores, a midstory of box elder and willow, and a substantial shrub understory (Bousman 2007), particularly in areas with more open space adjacent to the riparian habitat. Yellow warblers construct open-cup nests in upright forks of shrubs or trees in dense willow thickets or other dense vegetation (Lowther et al. 1999).

The yellow warbler is an uncommon to rare breeder in wooded riparian habitats, occurring primarily in association with alders and willows, in Santa Cruz County. Riparian woodlands in the County provide suitable nesting and foraging habitat for this species, but the species is scarce and local, being particularly scarce as a breeder on the immediate coast (Shuford and Gardali 2008). Nevertheless, it is possible that yellow warblers may breed in the riparian habitat along Watsonville Slough adjacent to the project, but they are not expected to nest in the project area. Otherwise, this species is a commonly observed migrant along the Watsonville Slough near the project area (Cornell Lab of Ornithology 2022).

Nesting Birds

Nesting birds may occur in trees, shrubs, understory vegetation, and shallow scrapes on bare ground in and around the project area. All migratory bird species are protected under California Fish and Game Code.

Natural Communities of Special Concern

There is one CDFW classified sensitive Natural Community of Special Concern within the project area. The cattail marsh adjacent to the 200 Manabe Ow Road project site is classified as Coastal and Valley Freshwater Marsh.

Sensitive Vegetation Alliances

There are no CDFW classified sensitive plant communities within the project area.

Critical Habitat/Essential Fish Habitat (EFH)

As defined by the National Oceanic and Atmospheric Administration, essential fish habitat (EFH) includes coral reefs, kelp forests, bays, wetlands, rivers, and areas of the deep ocean that are necessary for fish reproduction, growth, feeding, and shelter.[6] It includes all types of aquatic habitat and specifies where a certain fish species lives and reproduces. There is no designated critical habitat or EFH within the project area. However, critical habitat for several species and EFH is located within five miles of the project area (Appendix B Biological Resources Report, Appendix A, Figure 5).

- **Santa Cruz Tarplant**. Critical habitat for Santa Cruz tarplant is located approximately 150 feet north of the project area on the north side of Watsonville Slough (Unit I) and approximately 2.3 miles northeast of the project area along Elkhorn Road (Unit K).
- **California Red-legged Frog**. Critical habitat for California red-legged frog is located approximately 0.23 miles northwest of the project area, including Watsonville Slough, Harkins Slough, and Struve Slough (Unit SCZ-2).
- **South-Central California Coast Steelhead DPS.** Critical habitat for steelhead includes the Pajaro River and Lagoon, but does not include Watsonville, Harkins, or Struve Sloughs. The confluence of the Pajaro River and Watsonville Slough is approximately five miles downstream of the project area.
- **Tidewater Goby**. Critical habitat for tidewater goby includes the lower reach of the Pajaro River and lagoon, as well as the lowermost 1.2 miles of Watsonville Slough south of West Beach Road (Unit SC-8), approximately four miles from the project area. Watsonville Slough north of West Beach Road, including the Harkins and Struve Sloughs are not designated as critical habitat.
- **EFH**. All tidally influenced areas of the Pajaro River, and Watsonville Slough are designated as EFH for species federally managed under fisheries management plans (FMPs) (Pacific Fisheries Management Council 1998, 2011, 2012). Only the lowermost portion of Watsonville Slough is tidally influenced, approximately four miles downstream of the project area.

[6] NOAA Fisheries website. Understanding Essential Fish Habitat. Accessed May 12, 2023 at: https://www.fisheries.noaa.gov/insight/understanding-essential-fish-habitat#:~:text=Essential%20fish%20habitat%20includes%20coral,growth%2C%20feeding%2C%20and%20shelter.

Wildlife Corridors

Wildlife corridors are segments of land that provide a link between these different habitats while also providing cover. Development that fragments natural habitats (i.e., breaks them into smaller, disjunct pieces) can have a twofold impact on wildlife: first, as habitat patches become smaller, they are unable to support as many individuals (patch size); and second, the area between habitat patches may be unsuitable for wildlife species to traverse (connectivity).

Due to habitat fragmentation in the project region, the vegetation communities along streams and other aquatic features often function as environmental corridors that allow animals to move among habitat patches. Since the drainage channel adjacent to the 200 Manabe Ow Road project site is confluent with Watsonville Slough, the channel, and adjacent upland areas likely function as a wildlife movement corridor that provides movement and refugia for wildlife found in the Watsonville Slough corridor. However, since the developed and grassland areas of the project site at 100 Manabe Ow Road are in an urban setting and are not adjacent to or connect to open space areas, these areas likely function as an isolated wildlife corridor that provides movement and refugia for wildlife that are commonly found only in developed areas.

3.4.2 Regulatory Setting

Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, provides the regulatory framework for the protection of plant and animal species (and their associated critical habitats), which are formally listed, proposed for listing, or candidates for listing as endangered or threatened under FESA. FESA has the following four primary components: (1) provisions for listing species, (2) requirements for consultation with the USFWS and NOAA Fisheries, (3) prohibitions against "taking" (i.e., harassing, harming, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to engage in any such conduct) of listed species, and (4) provisions for permits that allow incidental "take". FESA also discusses recovery plans and the designation of critical habitat for listed species.

Both the USFWS and NOAA Fisheries share the responsibility for administration of FESA. Section 7 requires federal agencies, in consultation with, and with the assistance of the USFWS or NOAA Fisheries, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. Non-federal agencies and private entities can seek authorization for take of federally listed species under Section 10 of FESA, which requires the preparation of a Habitat Conservation Plan.

U.S. Migratory Bird Treaty Act

The U.S. Migratory Bird Treaty Act (MBTA; 16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is "unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported,

carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof…" In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA.

State Regulations

California Environmental Quality Act (CEQA)

CEQA (Public Resources Code Sections 21000 et. seq.) requires public agencies to review activities which may affect the quality of the environment so that consideration is given to preventing damage to the environment. When a lead agency issues a permit for development that could affect the environment, it must disclose the potential environmental effects of the project. This is done with an "Initial Study and Negative Declaration" (or Mitigated Negative Declaration) or with an "Environmental Impact Report." Certain classes of projects are exempt from detailed analysis under CEQA if they meet specific criteria and are eligible for a Categorical Exemption.

CEQA Guidelines Section 15380 defines endangered, threatened, and rare species for purposes of CEQA and clarifies that CEQA review extends to other species that are not formally listed under the state or federal Endangered Species acts but that meet specified criteria. The state maintains a list of sensitive, or "special-status," biological resources, including those listed by the state or federal government or the California Native Plant Society (CNPS) as endangered, threatened, rare or of special concern due to declining populations. During CEQA analysis for a proposed project, the California Natural Diversity Data Base (CNDDB) is usually consulted. CNDDB relies on information provided by the California Department of Fish and Wildlife (CDFW), USFWS, and CNPS, among others. Under CEQA, the lists kept by these, and other widely recognized organizations are considered when determining the impact of a project.

California Endangered Species Act

The California Endangered Species Act (CESA; Fish and Game Code §§ 2050 et seq.) generally parallels the FESA. The CESA establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Section 2080 of the California Fish and Game Code prohibits the take, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or by the regulations. "Take" is defined in Section 86 of the California Fish and Game Code as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." This definition differs from the definition of "take" under FESA which defines "take" as harassing, harming, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to engage in any such conduct, of listed species. CESA is administered by CDFW. CESA allows for take incidental to otherwise lawful projects but mandates that State lead agencies consult with the CDFW to ensure that a project would not jeopardize the continued existence of threatened or endangered species.

California Fish and Game Code Sections 1600-1607

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

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was created in 1977 with the intent to preserve, protect, and enhance rare and endangered plants in California (California Fish and Game Code sections 1900 to 1913). The NPPA is administered by CDFW, which has the authority to designate native plants as endangered or rare and to protect them from "take." CDFW maintains a list of plant species that have been officially classified as endangered, threatened, or rare. These special-status plants have special protection under California law and projects that directly impact them may not qualify for a categorical exemption under CEQA guidelines.

Fully Protected Species and Species of Special Concern

The classification of California fully protected (CFP) species was the CDFW's initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (§5515 for fish, §5050 for amphibian and reptiles, §3511 for birds, §4700 for mammals) deal with CFP species and state that these species "…may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species" (CDFW Fish and Game Commission 1998). "Take" of these species may be authorized for necessary scientific research. This language makes the CFP designation the strongest and most restrictive regarding the "take" of these species. In 2003, the code sections dealing with CFP species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species.

California species of special concern (CSSC) are broadly defined as animals not listed under FESA or CESA, but which are nonetheless of concern to CDFW because they are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA, and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under CEQA during project review.

California Migratory Bird Protection Act

Fish & Game Code section 3513 states that federal authorization of take or possession is no longer lawful under the state Fish & Game Code if the federal rules or regulations are inconsistent with state law. The California Migratory Bird Protection Act (MBPA) was passed in September 2019 to provide a level of protection to migratory birds in California consistent with the U.S. MBTA.

Nesting Birds

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

Non-Game Mammals

Sections 4150-4155 of the California Fish and Game Code protects non-game mammals, including bats. Section 4150 states "A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission." The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under California Fish and Game Code, in addition to being protected if they are a listed species (e.g., CSSC, CFP, state or federal threatened, or state or federal endangered).

Sensitive Vegetation Communities

Sensitive vegetation communities are natural communities and habitats that are either unique in constituent components, of relatively limited distribution in the region, or are of particularly high wildlife value. These communities may or may not necessarily contain special-status species. Sensitive natural communities are usually identified in local or regional plans, policies, or regulations, or by the CDFW (i.e., CNDDB) or the USFWS. The CNDDB identifies a number of natural communities as rare, which are given the highest inventory priority (Holland 1986; CDFW 2016). Impacts to sensitive natural communities and habitats must be considered and evaluated under CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

Local Regulations

Watsonville Municipal Code

The following provisions of the Watsonville Municipal Code help to minimize adverse effects to biological resources as a result of development in Watsonville:

> *Chapter 7-11, Street Trees* - it is unlawful to plant, trim, or remove any street tree without procuring a permit from the Director of Public Works.
>
> *Chapter 7-13, Preservation of Historical Trees* - The City's Recreation Department and the Recreation and Parks Commission are authorized to recommend to the City Council that certain trees be "designated" in order to preserve the tree(s) for their special character, historical value, or aesthetic interest. The Recreation Department maintains a record of designated trees. Any permit application for work that would impact a designated tree is forwarded to the Recreation Department and the Recreation and Parks Commission for review.

Watsonville 2005 General Plan

The Watsonville 2005 General Plan includes policies that are relevant to the protection of biological resources and applicable to the proposed projects. The policies are identified in Chapter 9, Environmental Resource Management, of the General Plan and are listed below.

> *Policy 9.B Natural Resource Protection*. The City shall designate land necessary for the preservation of natural resources and to avoid conflicts with urban land uses.
>
> > *9.B.6 Environmental Review* – The City shall conduct an appropriate environmental review process and require that proposed projects adjacent to surrounding, or containing, wetlands be subject to a site-specific analysis which will determine the appropriate size and configuration of areas to buffer wetlands from 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.
>
> > *9.D.5 Wetland Protection* – Where drainage from developments involves discharge into sloughs or wetlands, grease, sediment traps, or other protection measures shall be required. Mitigation monitoring shall be required and enforced by the City to ensure performance as appropriate.
>
> *Policy 9.E Soil Conservation* - The City shall prevent degradation of local soil resources through erosion control improvement and grading guidelines.
>
> > *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.

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.

9.E.4 Sediment Containment – The City shall require that all topsoil stored on-site during construction be contained to prevent escape of sediment from the site.

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

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. Freshwater Marshes and Sloughs

c. Woodlands and Steep Slopes

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.

3.4.3 Thresholds of Significance

Potential impacts to biological resources were determined in accordance with Appendix G of the CEQA Guidelines. Impacts would be considered potentially significant if the proposed project will:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

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

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

f) Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan.

3.4.4 Impact Discussion

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant with Mitigation Incorporated.

California Red-legged Frog and Western Pond Turtle

Based on the current conditions within the soil stockpile site and project site, the California red-legged frog and western pond turtle may be present in these areas. Project activities would result in the permanent loss of upland refugia on the project site and soil stockpile area for both species, and potential upland nesting habitat for the western pond turtle, given the sites' proximity to Watsonville Slough.

Impact BIO-1: Project activities could result in the following impacts:

- Injury or mortality to these species if they are present on the site when project activities are initiated,
- Disruption of foraging and dispersal behavior/disruption of seasonal movements leading to risk of desiccation and predation,
- Release of petrochemicals (hydraulic fluids, oil spills) could kill individuals,
- Increased human habitation in the area may result in an increase in native and non-native predators that would be attracted to trash on the project site,
- Spread of pathogens such as chytrid fungus, which can impair the health of amphibians.

However, the implementation of Mitigation Measures BIO-1a through BIO-1j will reduce project impacts and avoid take of California red-legged frog and western pond turtle that may be present

within the 100 Manabe Ow Road project site and stockpile area. With the implementation of these measures, potential impacts to these species will be less than significant.

Mitigation Measure BIO-1a. Conduct Preconstruction Survey. No more than 24 hours prior to the date of initial ground disturbance, a pre-construction survey for California red-legged frog and western pond turtle will be conducted within the impact area by a qualified biologist. The survey will consist of walking the limits of impact to ascertain the possible presence of the species. The qualified biologist will investigate all potential areas that could be used by California red-legged frog and western pond turtle for feeding, sheltering, movement, and other essential behaviors.

A qualified biologist is an individual who shall have a degree in biological sciences or related resource management with a minimum of two seasonal years post-degree experience conducting surveys for each amphibian and reptile special-status species that may be present within the project areas. During or following academic training, the qualified biologist shall have achieved a high level of professional experience and knowledge in biological sciences and special-status species identification, ecology, and habitat requirements. Additionally, the qualified biologist must be permitted or authorized to handle and relocate California red-legged frog and western pond turtle.

Mitigation Measure BIO-1b. Worker Environmental Awareness Program. All construction personnel will participate in a worker environmental awareness program. These personnel will be informed about the possible presence of all special-status species and habitats associated with the species identified here to be potentially present in the parcel and that unlawful take of the animal or destruction of its habitat is a violation of law. Prior to construction activities, a qualified biologist will instruct all construction personnel about (1) the description and status of the species; (2) the importance of their associated habitats; (3) a list of measures being taken to reduce impacts on these species during project construction and implementation; and (4) measures to be followed if special-status species are encountered during construction activities. A fact sheet conveying this information will be prepared for distribution to the construction crew and anyone else who enters the project site.

Mitigation Measure BIO-1c. Install Wildlife Exclusion Barrier. Prior to any ground disturbance in the work area, a temporary wildlife exclusion barrier will be installed along the limits of disturbance. A qualified biologist will inspect the area prior to installation of the barrier. The barrier will be designed to allow the California red-legged frog and western pond turtle to leave the work area and prevent them from entering the work area. The fence will remain in place until all development activities have been completed. This barrier will be inspected daily and maintained and repaired as necessary to ensure that it is functional and is not a hazard to California red-legged frogs on the outer side of the barrier.

Mitigation Measure BIO-1d. Vegetation Removal. All vegetation within the work area will be cut to four inches in height by a high-wheel mower or weed-whip just prior to the initiation of grading to remove cover that might be used by California red-legged frogs and/or western pond turtles. A qualified biologist authorized to handle California red-legged frogs and/or western pond turtles will walk with the mower/whip to monitor for species during the vegetation removal.

Mitigation Measure BIO-1e. Construction Monitoring. A qualified biologist or biological monitor will be onsite during all project activities that may result in take of any special-status species. The qualified biologist will be given the authority to freely communicate verbally, telephone, electronic mail, or in writing at any time with construction personnel, any other person(s) at the project site, otherwise associated with the project, and regulatory agencies (e.g., USFWS or CDFW). The qualified biologist or biological monitor will have oversight over implementation of all the mitigation measures and will have the authority and responsibility to stop project activities if they determine any of the measures are not being fulfilled.

A biological monitor is an individual who shall have academic and professional experience in biological sciences and related resource management activities as it pertains to this project, experience with construction-level biological monitoring, be able to recognize species that may be present within the project area and be familiar with the habits and behavior of those species.

Mitigation Measure BIO-1f. Relocation of California Red-legged Frog and Western Pond Turtle. If a red-legged frog or western pond turtle is found during project activities, work will stop until a qualified biologist that is permitted to handle California red-legged frog or authorized to handle western pond turtle relocates the animal from the impact area before groundwork starts again. Only a qualified biologist will capture, handle, and move California red-legged frog and western pond turtle. The qualified biologist will monitor any relocated frog or turtle until it is determined that it is not imperiled by predators or other dangers. See Mitigation Measure BIO-2a for the definition of a qualified biologist.

Mitigation Measure BIO-1g. Daytime Restriction. No work will be performed during nighttime hours. If construction is necessary at dawn or dusk, lights will be directed away from Watsonville Slough and the Cattail Marsh habitats.

Mitigation Measure BIO-1h. Food and Trash. To eliminate an attraction for the predators of the California red-legged frog and western pond turtle, all food-related trash items such as wrappers, cans, bottles, and food scraps will be disposed of in solid, closed containers (trash cans) and removed at the end of each working day from the entire construction site. Dogs or other pets will not be allowed on site during construction.

Mitigation Measure BIO-1i. Steep-walled Holes and Trenches. To prevent inadvertent entrapment of the California red-legged frog or western pond turtle, a qualified biologist, biological monitor, and/or construction foreman/manager will ensure that all excavated, steep-walled holes or trenches more than one foot deep are completely covered at the close of each working day by plywood or similar materials or provided with one or more escape ramps constructed of earth fill or wooden planks and inspected by a qualified biologist. Before such holes or trenches are filled, they will be thoroughly inspected for trapped animals by a qualified biologist and/or construction foreman/manager. If at any time a trapped California red-legged frog or western pond turtle is discovered by a qualified biologist or anyone else, the steps in Mitigation Measure BIO-2f Relocation of California red-legged frog and Western Pond Turtle will be followed.

Mitigation Measure BIO-1j. Prohibition of Plastic Mono-filament Netting. To prevent trapping California red-legged frogs or other species at the project site, erosion control

materials containing plastic mono-filament netting or similar material will not be used, even if it is labeled as biodegradable. Acceptable substitutes include coconut coir matting, straw/coconut finer erosion blanket, straw wattles wrapped in burlap, coir logs, and/or tackifier.

Crotch Bumble Bee

A portion of the Project site and soil stockpile site are covered with gravel substrate, but they also support grassland habitat that could be occupied by the Crotch bumble bee. Due to the potential occurrence of this species within the project site and stockpile area, there is some potential for this species to be impacted by project activities. Potential impacts that could occur include burying or destroying active bumble bee nests supporting several dozen to several hundred individuals, burying or destroying hibernating individuals, and permanent loss of nesting, hibernating, and foraging habitat. Due to the rarity of this species and its candidacy for protection under the CESA, such impacts would be significant under CEQA. However, the implementation of Mitigation Measures BIO-2a and 2b, below, will reduce project impacts on the Project site and stockpile area to less than significant.

Mitigation Measure BIO-2a. Focused Surveys for the Crotch Bumble Bee. Within one year of Project initiation, a qualified biologist shall conduct a focused survey for the Project site and stockpile area. These surveys shall be conducted during the flight season (March - September), timed to occur when detection probability is highest, including surveys in early spring (early April) and early summer (early July). Focused surveys shall be conducted during four evenly spaced sampling periods during the flight season. Surveys shall be conducted by a qualified biologist with knowledge of the life history and ecology of special-status bumble bees. Reference sites shall be visited to confirm bumble bee activity as flight periods may vary geographically and with weather. Surveys shall be conducted within the project site, stockpile area, and accessible adjacent areas with suitable habitat. Survey results shall be documented and will be submitted to the City, if requested. At a minimum, a survey report shall provide the following:

1. A description and map of the survey area, focusing on areas that could provide suitable habitat for the Crotch bumble bee;

2. The name(s) of qualified biologist(s) and their qualifications, date and time of the survey, survey duration, general weather conditions, and survey methodology.

3. Figure showing the locations of nest/colonies; and,

4. A description of the physical (e.g., soil type, moisture, slope aspect) and biological conditions (e.g., dominant plant species) where each nest/colony was detected.

5. A description of primarily impacted habitat, including plant composition (e.g., density, cover, and abundance) within the impacted habitat (e.g., species list separated by vegetation class, density, cover, and abundance of each species).

If the project site or stockpile area is not occupied by the Crotch bumble bee, no additional actions are warranted. However, if there are any delays in project scheduling greater than one year following the focused surveys, the surveys shall be repeated.

If the crotch bumble bee is found to occupy the project site or stockpile area, Mitigation Measures BIO-1b above (Worker Environmental Awareness Program) shall be implemented.

Mitigation Measure BIO-2b. Regulatory Agency Consultation. If a qualified biologist determines that the Crotch bumble bee is present on the Project site or stockpile area, and if "take" or adverse impacts to the bumble bee cannot be avoided, the CDFW shall be consulted to determine if a CESA Section 2080 Incidental Take Permit is required. If an Incidental Take Permit is required, the project shall comply with the requirements of the ITP. Typical requirements of an ITP include compensatory mitigation for the loss of habitat, and a Habitat Mitigation and Monitoring Plan to ensure that conservation lands are functioning properly. Typical requirements of an HMMP include a planting plan and associated success criteria, and long-term monitoring of the habitat.

American Peregrine Falcon, Northern Harrier, Tricolored Blackbird, White-tailed Kite, and Yellow Warbler

Less than Significant Impact. American peregrine falcon, northern harrier, tricolored blackbird, white-tailed kite, and yellow warbler are seen regularly in the project region and may fly through or forage in the project site. However, these species are unlikely to nest in the project area or adjacent areas because of the lack of suitable nesting habitat. All five species will only be temporarily displaced by construction noise and can forage in areas surrounding the project. Therefore, impacts to American peregrine falcon, northern harrier, tricolored blackbird, white-tailed Kite, and yellow warbler will be less than significant. In the unlikely event that any of these species nest in the project area, compliance with Mitigation Measure BIO-1 (see below) would reduce project impacts on these species to less than significant.

Nesting Birds

All migratory bird species and their nests are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Project activities must comply with the provisions of the MBTA and California Fish and Game Code (i.e., avoid take of protected nesting birds). Project-related impacts to nesting birds would be considered significant under CEQA.

Construction disturbance during the avian breeding season (February 1 through September 15, 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. In addition, noise and increased construction activity could temporarily alter foraging behavior, potentially resulting in the abandonment of nest sites. However, with the implementation of Mitigation Measure BIO-3 below, impacts to nesting birds will be less than significant.

Impact BIO-3: Construction disturbance during the avian breeding season could cause the incidental loss of eggs or nestlings, or cause the abandonment of nests, resulting in the incidental take of protected nesting birds.

Mitigation Measure BIO-3: Pre-Construction/Pre-Disturbance Survey for Nesting Birds.

Avoidance. To the extent feasible, construction activities, including soil stockpiling, should be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the MBTA and California Fish and Game Code would be avoided. The nesting season for most birds in Santa Cruz County extends from February 1 through September 15.

Pre-Construction Surveys. To avoid impacts to nesting birds and violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (that is, prior to February 1 or after September 15). If construction and construction noise occur within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance, including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests. The surveys shall be conducted by a qualified biologist no more than five (5) days before commencement of any vegetation trimming, site disturbance activities and/or equipment mobilization. If project activities are delayed by more than 5 days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented.

If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and/or mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, grading, and soil stockpiling), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, unless smaller buffers are determined to be appropriate by a qualified biologist. If work is required within the aforementioned buffers, the qualified biologist will assess the level of disturbance from the planned work and determine if a smaller buffer is warranted (e.g., installation of sheet pile with an impact hammer would not warrant a smaller buffer, but minor grading and excavation may warrant a smaller buffer). If the qualified biologist determines that a smaller buffer is warranted, then the planned work may proceed. The qualified biologist will observe the behavior of the nesting bird(s) and/or chicks during the onset of the planned work and if the nesting bird(s) and/or chicks do not show signs of distress then work may resume within the smaller buffer. If the nesting bird(s) and/or chicks show signs of distress, then the planned work will cease within the smaller buffer and work may resume within the original buffer established. The buffer shall remain in place until the chicks have fledged. Monitoring by a qualified biologist will ensure compliance with MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented and submitted to the project's Principal Planner at the Community Development Department for internal record-keeping.

Impacts from Bird Collisions

The project proposes the construction of a one-story industrial warehouse building with a two-story office that has a partial glass façade on one side of the building. Glass windows and facades have the potential to cause injury or mortality to birds when birds collide with these surfaces. Birds do not perceive glass as an obstruction in the same way that humans do. As a result, they may

collide with glass walls or windows if the glass reflects the sky or nearby vegetation and is not perceived as an obstruction, when transparent glass appears to be a clear pathway, or when vegetation behind transparent glass (such as behind glass railings) appears unobstructed.

The Cattail Marsh within a narrow strip along the west perimeter of the 200 Manabe Ow site attracts a variety of urban-adapted and riparian bird species (see Figure 4 in Appendix B, Biological Resources Report). Additionally, the Watsonville Slough riparian corridor provides high quality habitat for a variety of bird species, which could travel through the project area en route to the riparian corridor. Based on a review of the building renderings in the site plans, at least half of one side of the proposed buildings would be composed of glass and the project would incorporate landscaping with trees, grasses, and shrubs around the buildings. While this landscaping is minimal and would not have a high habitat value to birds, it would attract birds in the area and increase bird activity around the buildings. Therefore, following construction of the project, birds using the on-site landscaping and flying between landscaped areas on the site and the Cattail Marsh and the Watsonville Slough riparian corridor may collide with the buildings, resulting in the death of migratory species. Special-status bird species are not expected to make use of the landscaping in the project area.

The most common bird strike zone is from the ground to 60 feet, and then again at 500 feet for skyscrapers (SF Planning Department 2011). The proposed buildings would be glazed from grade level or just above grade level to approximately 25 feet above grade. Glazing starts to be a hazard to birds at about 24 square feet in size, and both buildings have expanses of glass that exceed that size. The site plans do not detail the type of glass that is proposed for the buildings, so it is unknown if the glass is made with patterns or has light reflectance values that may be more visible to birds and thereby reduce the likelihood of collision with the glass. There are no adopted City of Watsonville bird-safe standards.

Since the buildings will be surrounded by landscaping and are adjacent to habitats that attract a variety of birds there could be a cumulatively significant loss of birds over time and in addition to bird loss from other similar buildings planned in the project area. The cumulative impact is potentially significant under CEQA. However, with the implementation of Mitigation Measure BIO-4 would minimize the loss of birds by window strike to a less than significant level.

> **Impact BIO-4:** The project has the potential to result in potentially significant impacts due to bird collisions.
>
> **Mitigation Measure BIO-4: Standards for Bird Safe Buildings.** The project shall implement the following bird-safe design considerations:
>
> - Use glazing or window coatings/markings that reduce bird strike hazard caused by transparency, reflectance, black hole, or passage effect, etc., such as Guardian Bird1st etch glass or similar. See recommendations by the American Bird Conservatory at https://abcbirds.org/glass-collisions/
>
> - Minimize plants or landscaped areas behind glass.
>
> - Minimize concentrations of plantings adjacent to glass facades.

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

Sensitive Communities

No Impact. Sensitive vegetation communities include riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or designated by the USFWS and CDFW. The 100 Manabe Ow Road project area is classified as Developed landcover and is not considered sensitive.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact. The project site is considered "Developed" landcover without any sensitive habitat present. However, the proposed projects include the creation of impervious surfaces due to the construction of buildings and paved roads and parking areas, which will result in an increase in stormwater runoff ultimately discharging into stream habitat, including Watsonville Slough. Runoff can contain harmful pollutants like trash, chemicals, and dirt/sediment which may adversely affect water quality and wildlife. Construction activities could cause the degradation of surface or groundwater quality in Watsonville Slough due to erosion and transport of fine sediments or unintentional release of contaminants. Therefore, project-related impacts to stream habitat would be considered significant under CEQA.

Construction projects in California causing land disturbances that are equal to 1.0 acre or greater must comply with State requirements to control the discharge of stormwater pollutants under National Pollutant Discharge Elimination System (NPDES)/Construction General Permit. Prior to the start of construction/demolition, a Notice of Intent must be filed with the State Water Board describing the project. A Storm Water Pollution Prevention Plan (SWPPP) must be developed and maintained during the project, and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant use various measures including, among other measures, on-site sediment control best management practices, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks.

Section 6-3.532 of the City's Municipal Code requires an Erosion and Sediment Control Plan (ESCP) for all projects, regardless of size, when applying for a grading or building permit. The intent of this requirement is to ensure that, during rain events, construction activities do not increase the levels of erosion and sedimentation. This plan will include the use of erosion-control materials (e.g., baffles, fiber rolls, or hay bales; temporary containment berms) and erosion-control measures such as straw application or hydroseeding with native grasses on disturbed slopes; and floating sediment booms and/or curtains to minimize any impacts that may occur due to increased mobilization of sediments. Suitable erosion control, sediment control, source control, treatment control, material management, and non-stormwater management best management practices will be implemented.

The following list of BMPs will protect biological resources:

- Work areas that are temporarily impacted will be restored with respect to pre-existing contours and conditions, to the extent feasible, upon completion of work. Restoration work including re-vegetation and soil stabilization will be evaluated upon completion of work and performed, as needed.
- Store, handle, and dispose of construction materials and wastes properly, so as to prevent their contact with stormwater.
- Control and prevent the discharge of all potential pollutants, including solid wastes, paints, concrete, petroleum products, chemicals, wash water or sediment and non-stormwater discharges to storm drains and water courses.
- Avoid cleaning, fueling, or maintaining vehicles on site, except in a designated area in which run-off is contained and treated.
- Perform clearing and earth moving activities during dry weather to the maximum extent practical.
- Remove spoils promptly and avoid stockpiling of fill materials when rain is forecast. Cover soil stockpiles and other materials with a tarp or other waterproof material during qualifying rain events.
- Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination and dispersal by wind.
- In the event of rain, all grading work is to cease immediately.
- Implement an erosion control plan during the wet season (October 15 through April 15), including, at a minimum, the following:
    - All paved areas will be kept clear of earth material and debris
    - Inlet protection will be installed at open inlets to prevent sediment from entering the storm drain system.
    - Straw rolls will be placed at the toe of slopes, and along the down slope perimeter of the project area.
    - To prevent trapping of animals, plastic mono-filament netting (erosion control matting), rolled erosion control products or similar material will not be used at the project site.
- Implement an approved accidental spill plan to describe what actions will be taken in the event of a spill. The plan will incorporate preventative measures to be implemented, such as vehicle and equipment staging, cleaning, maintenance, and refueling; and contaminant (including fuel) management and storage. In the event of a contaminant spill, work at the site will immediately cease until the contractor has contained and mitigated the spill. The contractor will immediately prevent further contamination and notify appropriate authorities (such as the City or other permitting agencies) and mitigate damage. Adequate spill containment materials, such as oil diapers and hydrocarbon cleanup kits, shall always be available on site. Containers for storage, transportation, and disposal of contaminated absorbent materials will be provided in the project site.

In addition to construction-phase requirements, new and redevelopment projects in many California counties, including Santa Cruz County, that create and/or replace more than 2,500 square feet of impervious surface must also comply with the California Regional Water Quality Control Board, Central Coast Region, Central Coast Post-Construction Stormwater Requirements (PCRs) (Resolution R3-2013-0032). The resolution requires that projects implement BMPs and incorporate Low Impact Development practices into the design that prevent stormwater runoff

pollution, promote infiltration, and hold/slow down the volume of stormwater runoff from a site. To meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, bioretention and/or detention basins, among other on-site treatment controls.

During the construction phase, compliance with the requirements to control the discharge of stormwater pollutants under the Construction General Permit and PCRs, as well as under the ESCP will reduce impacts to stream habitat to a less than significant level. Compliance with the Construction General Permit, PCRs and ESCP is considered part of the project, therefore no mitigation is required. The project also incorporates stormwater detention basins to manage stormwater from post-project conditions. The impact is considered less than significant.

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

Less than Significant Impact. Construction activities could temporarily restrict some wildlife species from moving between suitable habitat patches. Noise and disturbance associated with construction activities could cause a temporary reduction in habitat connectivity through the site for species that commonly use habitats in the project area. Furthermore, construction fencing and/or wildlife exclusion fencing could substantially reduce habitat connectivity through the site. However, wildlife would still be able to move through the Watsonville Slough habitat adjacent to the site. Because project construction will not occur at night when many mammals, reptiles, and amphibians are active, use of these habitats by dispersing nocturnal animals would not be diminished during construction. Therefore, impacts to wildlife movement from construction activities are expected to be less than significant.

Once construction activities are complete, the developed land cover (e.g., parking areas and buildings) would restrict wildlife movement through the sites compared to existing conditions. However, wildlife would still be able to move through the project area by using the riparian corridor of Watsonville Slough. Numerous animals likely breed within and around the project area, but no particularly important wildlife nursery areas are present in the project area or would be impacted by the project. Therefore, wildlife dispersal through the project area after construction is a less than significant impact.

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

No Impact. The proposed project does not conflict with local policies, including the Watsonville Municipal Code and the Watsonville 2005 General Plan.

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

No Impact. The proposed project does not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, as they are not located in a conservation plan area. The project

area is not included in the Coastal Zone and are not subject to Coastal Land Use Plan and policies.

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3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

3.5.1 Environmental Setting

Ethnography

Watsonville is located in the center of the Pajaro Valley, approximately five miles inland from the shore of Monterey Bay, and midway between the bay's northern and southern points. The known history of the area spans a great length of time, and evidence exists of human habitation for more than 10,000 years (Borg & Schoellhmer, 2012). The Native American people living in the project area called themselves the Ohlone. After the invasion by the Spanish in 1769, they were named Costanoans by the Spanish. Costanoan-speaking tribal groups occupied the area from the Pacific Coast to the Diablo Range and from San Francisco to Point Sur. The Ohlone were hunters and gatherers, living in "tribelets" – small independent groups of usually related families occupying a specific territory and speaking the same language or dialect. At the time of initial contact with European explorers, the project area is in the boundary area between the Mutsun-speaking Ohlone group: and the Awaswas-speaking Ohlone group (Kroeber 1970).

The Ohlone subdivided themselves into smaller village complexes or tribal groups. These groups were independent political entities, each occupying specific territories defined by physiographic features. Each group controlled access to the natural resources of the territories. Although each tribal group had one or more permanent villages, their territory contained numerous smaller campsites used as needed during a seasonal round of resource exploitation. Extended families lived in domed structures thatched with tule, grass, wild alfalfa, ferns or carrizo (Levy 1978).

The Ohlone settled along the Pajaro Dunes since the land was fertile and useful for the cultivation of their plants and animals. The tribe would have gathered the abundant plant and sea life and hunted animals such as birds, rabbits and tule elk. Remnants of their campsites have been discovered around the bay and by coastal streambeds (Borg & Schoellhmer, 2012).

European Exploration

The first European exploration by land was by Spain and led by Gaspar de Portola in 1769. Members of the party included Europeans as well as natives of Mexico. Their mission was to

discover desirable sites for the extension of the Baja California chain of Missions into what is today the state of California.

On October 10th 1769, Fray Crespi and Miguel Costanso, a member of Portola's expedition, described crossing a river that the soldiers named "Rio del Pajaro" because they had seen a large grass or straw stuffed bird. As the party passed through the valley, they recorded seeing very tall trees, palos colorados (or red trees), known today as coast redwoods. They decided to name the river Rio del Pajaro, or River of the Bird. Following the river crossing, the Portolá expedition continued through the area on its way north, camping at one of the lakes north of town for five nights. Many of the expedition soldiers were suffering from scurvy, so progress was slow. While the sick recuperated, scouts led by Sergeant Ortega went ahead to find the best way forward. On the fifth day, Franciscan missionary Juan Crespi, traveling with the expedition, noted in his diary that, "This afternoon the explorers returned. The sergeant reported that he had gone ahead twelve leagues without getting any information of the harbor that we are looking for, and that he went to the foot of a high, white mountain range. It was during this march, the explorers first saw the Coast redwood tree (Bolton, 1927). A bronze plaque at Pinto Lake (now a city park) commemorates the event.

19th and Early 20th Centuries

The area became part of the Spanish colonial province of Las Californias, and in 1804 the northern part was split off to form Alta California. The area's pasture lands were assigned to the Spanish mission to the south, in Carmel. In this historic period, the Ohlone people were subjugated and absorbed into the mission system for compulsory baptism and conversion to Christianity that resulted in the loss of their freedom of movement, their culture, and customs.

When Mexico gained independence, it took possession of Alta California, and former Mission-held lands were granted to Mexican citizens. Seven ranchos were in the immediate vicinity of present-day Watsonville— San Andres, Los Corralitos, Bolsa de Pajaro, Bolsa de San Cayetano, Salsipuedes, Laguna de Calabasas, and Vega del Rio del Pajaro. The future Watsonville area became Rancho Bolsa del Pajaro, a land grant made to Sebastian Rodríguez in 1837. Under Mexico's more liberal land-ownership laws, immigration to the area from Europe and the United States increased.

In 1846–48, the Mexican-American War resulted in the cession of California from Mexico to the United States. In 1848, the California Gold Rush greatly accelerated immigration to California, and many new settlers arrived in the valley to obtain land. The land was fertile, and a booming agricultural economy was created to raise crops for California’s exploding population. Even after the Gold Rush was over, immigrants from many foreign countries and the other States continued to arrive to participate in growing and harvesting the increasingly diverse crops.

In 1851, Judge John H. Watson arrived in the Pajaro Valley because he claimed to own some of Sebastian Rodriguez' property. Judge H. Watson laid out a township near the Pajaro River. Watson filed a claim in 1851 against Sebastian Rodriguez, proprietor of Rancho Bolsa de Pajaro for the land. Watson ultimately lost his claim against the Rodriguez family, and sometime in 1862, Watson left Watsonville and moved to Nevada. Watson never returned to the township. However, a Santa Cruz County under-sheriff referred to the area where Watson lived as Watson-ville and the name remained. The township incorporated March 30, 1868 to become the Town of Watsonville (Borg & Schoellhmer, 2012) (City of Watsonville, 2022).

In 1871, the Southern Pacific Railroad linked the area to the Santa Clara Valley and the area flourished and began to grow. Churches, schools, newspapers, libraries, and major business appeared as electricity and telegraph lines worked their way into the lives of its residents.

It wasn't until about 1889, that the town would incorporate again; this time as City of Watsonville. More than a decade later, in 1903, the voters adopted a City charter (Overmeyer, 2015).

Soon after, the Watsonville Railway and Navigation Company operated an interurban railway to Port Watsonville on Monterey Bay where it connected with an overnight produce packet boat to San Francisco from 1904 to 1913 (Fabing 1966).

Modern

Today, the valley's population reflects the historical diversity from Native tribes, the European settlers, and other immigrants following the agricultural boom. The valley's descendants include: Ohlones, Californios, Northern and Southern Europeans, Chinese, Japanese, Filipinos, African Americans, and others.

Agriculture and food processing remain the mainstay of the Pajaro Valley economic structure. Although other economies exist, including light industry, manufacturing, tourism, and service-oriented businesses.

3.5.2 Regulatory Setting

Federal

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

State

California Environmental Quality Act

Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local register of historic resources or identified as significant in a local survey conducted in accordance with state guidelines are also considered historic resources under CEQA, unless a preponderance of the facts demonstrates otherwise. Per CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude a Lead Agency from determining that the resource may be a historic resource as defined in California Public Resources Code (PRC) Section 5024.1. CEQA applies to archaeological resources when (1) the archaeological resource satisfies the definition of a historical resource or

(2) the archaeological resource satisfies the definition of a “unique archaeological resource.” A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

1. The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.

2. The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Register of Historical Resources (CRHR)

The CRHR is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.12

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource's period of significance.” The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project,

and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

California Penal Code Section 622.5

California Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Government Code Section 6254(r)

Government Code Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.

Government Code Sections 7920 et. seq.

Records housed in the Information Centers of the California Historical Resources Information System (CHRIS) are exempt from the California Public Records Act.

3.5.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the proposed project would have a significant impact related to historic, cultural, or tribal cultural resources if it would:

a) Cause a substantial adverse change in the significance of a historic resource as defined by CEQA Guidelines Section 15064.5;

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5;

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

d) Cause a substantial adverse change in the significance of a tribal cultural resources, 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

3.5.4 Impact Discussion

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. The cultural resources records search results from the CHRIS search at the Northwest Information Center (NWIC) indicate there are six historic buildings/structures located within a 0.5-mile radius of the project site, and one historic district containing multiple buildings and structure. These resources are summarized in Table 3.5-1 below:

Table 3.5-1: Historic Resources within 0.5 Miles of the Project Area

Resource Number	***Resource Name***	***Resource Type***	***Age***
P-44-000377	Southern Pacific Railroad	Structure	Historic
P-44-000404	OC-129, MC-129	Structure	Historic
P-44-000406	Highway 1 (Santa Cruz County)	Structure	Historic
P-44-000582	Redman-Hirahara Farmstead	Structure, District	Historic
P-44-000820	Otto Stoesser Farm (BLE-15-01)	Building	Historic
P-44-000904	Central California Berry Growers Association	Building	Historic
P-44-001157	ESA-Built-005	Structure	Historic

The City of Watsonville keeps its own historic register which contains 14 structures, six of which are on the NRHP. These are shown in Table 3.5-2, below:

Table 3.5-2: City of Watsonville Historic Register Entries

Address	***Resource Name***	***National Register Eligible***
261–261A East Beach Street	Richard Pearson Home	No
332 East Beach Street	Bockius-Orr House	Yes
128 East Beach Street	Julius Lee Home	Yes
12 Brennan Street	Watsonville Women's Club	No
225 East Lake Ave	N/A	No
305 East Lake Ave	Mitchell Resetar Home	No
335 East Lake Ave	Madison House	Yes
280 Main Street	Porter Building	No
406 Main Street	Lettunich Building	Yes
418–428 Main Street	Mansion House	Yes
426–434 Main Street	Kalich Building	No
Main/Beach/Peck/Union	Watsonville City Plaza	Yes
139 Maple Street	Horgan House	No
37 Sudden Street	Pajaro Valley Arts Council	No

The seven historic built environment resources identified by the NWIC, as well as the 14 buildings on the City's register are both outside of the project's boundary and would not be physically affected by the proposed project. Furthermore, development within the project site would be consistent with the surrounding environment and would not impact the historic character of historic resources in the vicinity of the proposed project. According to historic maps and aerial photographs from 1914 to the present day there has never been a structure built within the project site. As there are no identified historical resources, or buildings, or structures that could have potential to be considered historical resources within the project site, and the project has no potential to impact the historic character of nearby resources, the proposed project would have no impact to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. The cultural resources records search results conducted by the NWIC indicate there are no archaeological resources (prehistoric or historic) located within the project's boundaries. However, there are four prehistoric archaeological sites within 0.5 miles of the project site, including a known prehistoric site approximately 825 feet from the project site. There are no known historic archaeological resources. These resources are summarized in Table 3.5-3 below:

Table 3.5-3: Archaeological Resources within 0.5 Miles of the Project Area				
CHRIS Resource Number	***Ascension Number***	***Resource Type***	***Age***	***Approx. Distance from Project Site***
P-44-000111	CA-SCR-000107	Site	Prehistoric	825 feet (approx. 0.16 miles)
P-44-000151	CA-SCR-000148	Site	Prehistoric, Protohistoric	2560 feet (approx. 0.5 miles)
P-44-000159	CA-SCR-000156	Site	Prehistoric	2600 (approx. 0.5 miles)
P-44-000311	CA-SCR-000286	Site	Prehistoric	2150 feet (approx. 0.4 miles)

The cultural resources records search results conducted by the NWIC returned 59 reports within 0.5 miles of the project site, and two partially within the site boundary. None of the reports gave any additional information regarding additional archaeological resources in the project area or study area. The archaeological sites are described in more detail below.

P-44-000111/ CA-SCR-000107. This site is a multipurpose site, primarily characterized as a cemetery/burial site. The site also contains midden remains, and there is evidence of both short-term settlement, and the presence of a longer occupied village site. The remains found in this location date approximately to 500 B.C. (1500 BP/BCE). Dating information comes particularly from shell beads and their typology. The site therefore seems to date from Intermediate Horizon period. The site was situated on a knoll, rising above the surrounding environment. Artifacts found include stone pestles; chert and obsidian tools (including scrapers, knives, projectile points, flakes, and cores); shell beads; a large stone mortar, fragmentary hand mortars, a bone awl; animal bone; and fire cracked rock. This is in addition to the burials found. The site records show 45 burials found at the site. Many of the artifacts found were in association with the burials. The site is an important site in terms of religious and cultural significance in the early history of California and may represent both a linguistic and cultural boundary set along the channel which is now called Watsonville Slough.

P-44-000151/CA-SCR-000148. This site has had no finds associated with it, although was reported in 1976 by Frank Marcus of the Northwest Indian Cemetery Protective Association as being an area where Native Americans gathered medicinal plants. Three plants used by Native Americans for medicinal purposes were reportedly recorded here by Frank Marcus. Although not considered an archaeological resource, as such, this would meet the category of a Tribal Cultural Resource (TCR), which are described in more detail in Section 3.17, Tribal Cultural Resources. It is included in this section for completeness, as it is recorded on the NWIC CHRIS system. It is assumed that this site was used by Native Americans prior to or during the Spanish colonization of California, although no dating information is available. The resource boundary is approximate, and as the resource is not a site, is only loosely confined to the general area.

P-44-000159/CA-SCR-000156. This site was recorded in 1954 and contained darkened soil and small quantities of mollusk remains. Thought to be a potential midden, only surface evidence was observed and may be more extensive than observed from a pedestrian survey. The site boundary is assumed from the dark earth.

P-44-000311/CA-SCR-000286. This is a sparsely scattered midden site containing Monterey Chert stone flakes, shell remains, fire cracked stone, and unidentified animal bone. The presumed site boundary was determined by observing the shell remains on the surface which were scattered throughout the site.

A Sacred Lands File (SLF) search[7] was conducted through the NAHC, which was returned with a positive result on March 24, 2022, indicating that the *Costanoan Ohlone Rumsen-Mutsen Tribe* had more information on potential resources in the project vicinity. It was also recommended that the *Amah Mutsun Tribal Band*, *Amah Mutsun Tribal Band of Mission San Juan Bautista*, *Indian Canyon Mutsun Band of Costanoan*, and the *Wuksache Indian Tribe/Eshom Valley Band* be contacted as an extension of the SLF. Emails were sent to the tribes, which included a topographic map of the project area and details of the proposed project undertaking. All of the tribes who did not respond were then contacted by follow-up phone calls.

The representatives of the *Amah Mutsun Tribal Band* and *Costanoan Ohlone Rumsen-Mutsen* responded and requested Native American monitors be present at the site during ground disturbing activities due to known resources in close proximity to the area. Members of the *Amah Mutsun Tribal Band of Mission San Juan Bautista*, *Indian Canyon Mutsun Band of Costanoan*, requested archaeological and Native American monitoring as well as archaeological sensitivity training for construction personnel. The *Costanoan Ohlone Rumsen-Mutsen, Amah Mutsun Tribal Band, and Indian Canyon Mutsun Band of Costanoan* all referenced the Native American burial site across Watsonville Slough and therefore noted the project site's sensitivity for additional resources.

One tribe that did not provide a response were the *Wuksache Indian Tribe/Eshom Valley Band*, who received two emails and a voicemail.

A pedestrian survey was conducted by MIG archaeologist Robert Templar on the proposed project site on February 24, 2022. No evidence of prehistoric or other archaeological resources were noted during the survey. A slight raised area in the northwest corner of the site was noted for its lusher vegetation, although the study of recent aerial photography shows that this was the result of earth moving activity associated with the construction of Manabe Ow Road in 2016.

The above-referenced four archaeological sites are highly indicative of widespread Native American habituation in the project vicinity. With the presence of site P-44-000111/CA-SCR-000107, it is known that long term settlement occurred north of Watsonville Slough, almost adjacent to the project site, and the area had enough religious significance to be used as a burial site. Further evidence of habitation and potential religious significance is in site P-44-000151/CA-SCR-000148, which is stated as being a place where Native Americans gather medicinal plants. However, as suggested in the site report for site P-44-000111/CA-SCR-000107, the current route of Watsonville Slough may represent a cultural divide between the Mutsun and Awaswas

[7] The SLF search described here was completed for an adjacent parcel at 200 Manabe Ow Road. Since the 200 Manabe Ow and 100 Manabe Ow sites are adjacent to one another, the outreach and responses received for the 200 Manabe Ow site have been included here as relevant information on resources in the area. Outreach for the 100 Manabe Ow project was made via email to the listed tribes on 12/16/22 and two tribes responded (Valentin Lopez and Kanyon Sayers-Roods, again indicating there nearby resources and reiterating their requests for worker training and Native American monitoring during construction).

speaking Ohlone language group. This is likely not due to the slough itself, but the topography of the area. As shown on the USGS topographic map of Watsonville West, areas north of the slough are situated on slopes, whereas in contrast, south of the slough is completely flat, and would have been marshland at the time of Native settlement. Although the current route of the slough is in a partially engineered channel, it is known that this area was marshy in the prehistoric period, with many channels draining to the ocean, and would have been a less desirable location for settlement.

This theory appears to be supported by a lack of archaeological sites immediately south of Watsonville Slough. No archaeological sites have been recorded in the 0.5-mile study area situated south of the Watsonville Slough. Additionally, based on maps gathered from the report for the site P-44-000159/CA-SCR-000156, no known archaeological sites are within at least a 0.25 miles strip, running south of Watsonville Slough from the adjacent project site (200 Manabe Ow Road) to the Pacific Ocean. In contrast, many sites are situated along the north bank, or further north of Watsonville Slough in this area. Although not conclusive, this is suggestive that the project site, being just outside a presumed tribal boundary, is more unlikely to contain prehistoric sites, than the surrounding sites suggest. This corresponds to the natural topography of the area. The topography showing south of the slough as marshland is suggestive that cultural remains are more unlikely to be present, than north of the slough. However, there still exists the potential for archaeological resources to be present. Based on aerial photography from the recent past showing surface level ground disturbance, and on the site visit, it is considered unlikely that surface level resources, if ever present, would remain.

However, based on the above research, buried cultural resources could be present and project excavation could result in the discovery of prehistoric archaeological resources. If archaeological resources connected to site P-44-000111/CA-SCR-000107, or other similar site were present, they would very likely be considered a significant historic resource, eligible for both the CRHR and the NRHP, due to the potential to yield information important to the prehistory of the region.

In the event that project ground-disturbing activities disturb, damage, or destroy previously unknown buried prehistoric features, sites or artifacts, a significant impact could occur. Implementation of Mitigation Measures CUL-1 through CUL-3, below, would reduce potential impacts to undiscovered archeological resources to a less than significant level.

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

professional archaeologist would follow in conducting a salvage investigation, if one is necessary.

Mitigation Measure CUL-2: Conduct Archaeological and Native American Monitoring During Ground Disturbing Phases of Construction. Ground-disturbing activities beyond surface level soils shall be observed by a qualified archaeological monitor either meeting the Secretary of the Interior's Professional Qualifications Standards, or under the direction of an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards. Monitoring activities shall also include a Native American monitor for tribal cultural resources. If archaeological resources are encountered Mitigation Measure CUL-3 will apply. Archaeological monitoring may be reduced or halted at the discretion of the monitor as warranted by conditions such as encountering bedrock, ground disturbance is occurring in fill, or other indications that discovery is extremely unlikely. If monitoring is reduced to spot-checking, spot-checking shall occur when ground-disturbance moves to a new location within the project site and when ground disturbance will extend to depths not previously reached, unless those depths are within bedrock.

Mitigation Measure CUL-3: Discovery of cultural, historic, or archaeological resources during construction. The project applicant shall ensure that if any previously undisturbed cultural, historic, or archaeological resources are uncovered in the course of site preparation, clearing or grading activities that the City of Watsonville Community Development Director is notified and operations within 25 feet of the discovery are halted until such time as a qualified professional archaeologist can be consulted to evaluate the find and recommend appropriate action for collection, recordation, analysis, and reporting. If the find is determined to be significant, a Cultural Resources Treatment Plan shall be developed by a qualified archaeologist. The Treatment Plan shall reflect details pertaining to the depths and locations of excavation activities. The Treatment Plan shall be subject to review and approval by the City of Watsonville Community Development Department prior to any further ground disturbing activities being required. The Treatment Plan shall contain:

- Identification of the found resources;
- Treatment and curation steps for the found resources;
- Detailed field strategy to record, recover, or avoid the finds, and additional mitigation to protect further anticipated resources;
- A data recovery plan, which may include archaeological excavation, such as test pits, hand excavation, or auguring;
- Provisions for producing an archaeological report to be sent to the Northwest Information Center detailing the results of the archaeological discovery, and subsequent treatment and results;
- Any historic or prehistoric material identified in the project area during earth-disturbing activities shall be evaluated for eligibility for listing as a candidate City Landmark and/or in the California Register of Historic Resources. Data recovery methods may include, but are not limited to backhoe trenching, shovel test units, hand auguring and hand-excavation.

- Final Reporting: Once all analyses and studies required by the project-specific Cultural Resources Treatment Plan have been completed, the project applicant, or representative, shall prepare a final report summarizing the results of the field investigation, data recovery activities and results, and compliance with the Cultural Resources Treatment Plan during all demolition, grading, building, and other construction activities. The report shall document the results of field and laboratory investigations and shall meet the Secretary of the Interior's Standards for Archaeological Documentation. The contents of the report shall be consistent with the protocol included in the project-specific Cultural Resources Treatment Plan. The report shall be submitted to the City of Watsonville Community Development Department Director for review and approval prior to issuance of any Certificates of Occupancy (temporary or final). Once approved, the final documentation shall be submitted to the Northwest Information Center at Sonoma State University, as appropriate.
- Curation: Upon completion of the final report required by the project-specific Cultural Resources Treatment Plan, all recovered archaeological materials not identified as tribal cultural resources by the Native American monitor, shall be transferred to a long-term curation facility. Any curation facility used shall meet the standards outlined in the National Park Services' Curation of Federally Owned and Administered Archaeological Collections (36 CFR 79). The project applicant shall notify the Supervising Planner of the City of Watsonville Community Development Department. Enforcement of the selected curation facility prior to the issuance of any Certificates of Occupancy (temporary or final). To the extent feasible, and in consultation with the Native American representative, all recovered Native American/tribal cultural resources and artifacts shall be reburied on-site in an area that is unlikely to be disturbed again. Treatment of materials to be curated shall be consistent with the protocols included in the project-specific Cultural Resources Treatment Plan.
- All archaeological materials recovered during the data recovery efforts shall be cleaned, sorted, catalogued, and analyzed following standard archaeological procedures, and shall be documented in a report submitted to the Community Development Department Director and the NWIC.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. As shown above, in question b.), the project is situated within 250 feet of a known Native American prehistoric burial site. Although there is a possibility for the project site to be south of a cultural border and, due to this geography, contain no burials, the evidence for this is not conclusive, and there is the potential for burials connected to site P-44-000111/CA-SCR-000107 to be present within the proposed project. Implementation of Mitigation Measure CUL-4 would reduce potential impacts to undiscovered human remains to a less than significant level.

Impact CUL-4: Project excavation could disturb previously unknown buried archaeological resources and/or human remains.

Mitigation Measure CUL-4: Inadvertent Discovery of Human Remains If human remains of Native American origin are discovered during ground disturbing activities, the

project applicant shall comply with state laws relating to the dispositions of Native American burials, which falls within the jurisdiction of the California Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097.98). If human remains are discovered or recognized in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the planning area or any nearby area reasonably suspected to overlie adjacent human remains until:

- The Santa Cruz County Sherriff-Coroner has been informed and has determined that no investigation of the cause of death is required, and
- If the remains are of Native American origin:
    - The descendants from the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave good as provided in the Public Resources Code, Section 5097.98, or
    - The California NAHC was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the NAHC.

Implementation of mitigation measures Mitigation Measures CUL-1 through CUL-4 would ensure that the project would not have a significant impact on buried archaeological resources.

3.5.5 References

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3.6 ENERGY

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

3.6.1 Environmental Setting

Energy consumption is closely tied to the issues of air quality and greenhouse gas (GHG) emissions, as the burning of fossil fuels and natural gas for energy has a negative impact on both, and petroleum and natural gas currently supply most of the energy consumed in California. In general, California's per capita energy consumption is relatively low, in part due to mild weather that reduces energy demand for heating and cooling, and in part due to the government's proactive energy-efficiency programs and standards. According to the California Energy Commission, Californians consumed about 279,510 gigawatt hours (GWh) of electricity and 12,331 million therms of natural gas in 2020 (CEC 2021a and CEC 2021b). The CEC estimates that by 2030, California's electricity consumption will reach between 326,026 GWh and 354,209 GWh with an annual growth rate of 0.99 to 1.59 percent (CEC 2017), and natural gas consumption is expected to reach between 13,207 million and 14,190 million BTU with an annual growth rate of 0.25 to 0.77 percent (CEC 2017).

In 2021, total electricity use in Santa Cruz County was approximately 1,162 million kilowatt hours (kWh), including approximately 581 million kWh of consumption for non-residential land uses (CEC 2023a). Natural gas consumption was approximately 53 million therms in 2021, including approximately 20 million therms from non-residential uses (CEC 2023b).

Energy conservation refers to efforts made to reduce energy consumption to preserve resources for the future and reduce pollution. It may involve diversifying energy sources to include renewable energy, such as solar power, wind power, wave power, geothermal power, and tidal power, as well as the adoption of technologies and green building practices that improve energy efficiency. Energy conservation can be achieved through increases in efficiency in conjunction with decreased energy consumption and/or reduced consumption from conventional energy sources.

3.6.2 Regulatory Setting

Since increased energy efficiency is so closely tied to the State's efforts to reduce GHG emissions and address global climate change, the regulations, policies, and action plans aimed at reducing GHG emissions also promote increased energy efficiency and the transition to renewable energy sources. The U.S. EPA and the State address climate change through numerous pieces of

legislation, regulations, planning, policy-making, education, and implementation programs aimed at reducing energy consumption and the production of GHG.

CARB Low Carbon Fuel Standard Regulation

CARB initially approved the LCFS regulation in 2009, identifying it as one of the nine discrete early action measures in the *2008 Scoping Plan* to reduce California's GHG emissions. The LCFS regulation defines a Carbon Intensity, or "CI," reduction target (or standard) for each year, which the rule refers to as the "compliance schedule." The LCFS regulation requires a reduction of at least 10 percent in the CI of California's transportation fuels by 2020 and maintains that target for all subsequent years.

In 2018, CARB approved amendments to the LCFS regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in line with California's 2030 GHG emission reduction target enacted through Senate Bill 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. Under the 2018 amendment, the LCFS regulation now requires a reduction of at least 20 percent in CI by 2030 and beyond.

Advanced Clean Fleets Regulation

On April 28, 2023, CARB adopted the proposed Advanced Clean Fleet Regulation (ACF Regulation). The ACF Regulation establishes a 100 percent zero-emissions vehicles (ZEV) sales requirement on medium- and heavy-duty truck manufacturers and would require certain fleet owners to transition to zero-emissions medium- and heavy-duty vehicles from 2024 to 2045. Affected fleets include drayage truck operators, State and local government, federal government, and high priority fleets.

Renewable Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard (RPS) Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2017. The *2003 Integrated Energy Policy Report* recommended accelerating that goal to 20 percent by 2010, and the *2004 Energy Report Update* further recommended increasing the target to 33 percent by 2020. The state's *Energy Action Plan* also supported this goal. In 2006 under Senate Bill 107, California's 20 percent by 2010 RPS goal was codified. The legislation required retail sellers of electricity to increase renewable energy purchases by at least one percent each year with a target of 20 percent renewables by 2010. Publicly owned utilities set their own RPS goals, recognizing the intent of the legislature to attain the 20 percent by 2010 target.

On November 17, 2008, Governor Schwarzenegger signed Executive Order S-14-08 requiring "[a]ll retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020." The following year, Executive Order S-21-09 directed the California Air Resources Board, under its AB 32 authority, to enact regulations to achieve the goal of 33 percent renewables by 2020.

In October 2015, Governor Brown signed Senate Bill 350 to codify ambitious climate and clean energy goals. One key provision of SB 350 is for retail sellers and publicly owned utilities to procure "half of the state's electricity from renewable sources by 2030."

The State's RPS program was further strengthened by the passage of SB 100 in 2018. SB 100 revised the State's RPS Program to require retail sellers of electricity to serve 50% and 60% of the total kilowatt-hours sold to retail end-use customers be served by renewable energy sources by 2026 and 2030, respectively, and requires 100% of all electricity supplied come from renewable sources by 2045. As part of the package of bills signed into law by Governor Newsom on September 16, 2022, also referred to as the "California Climate Commitment", the State's RPS Program was strengthened once again by adding additional interim clean electricity targets. Specifically, SB 1020 established clean electricity targets of 90% by 2035 and 95% by 2040 with the intent of advancing the state's trajectory to the existing 100% clean electricity retail sales by 2045 (SB 100).

Title 24 Building Code Energy Standards

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code contains both mandatory and voluntary measures. For non-residential land uses there are 39 mandatory measures including, but not limited to, exterior light pollution reduction, wastewater reduction by 20 percent, and commissioning of projects over 10,000 square feet.

City of Watsonville Climate Action and Adaptation Plan

The City of Watsonville City Council adopted the Climate Action and Adaptation Plan (CAAP) in October 2021, which is a qualified GHG reduction strategy that may be used for the streamlining of GHG emissions analyses under CEQA. The CAAP identifies 19 strategies, 33 implementation measures, and 61 supporting efforts to help the City achieve its aggressive target of reducing GHG emissions by 80 percent below 1990 levels, by 2030, and to also have net-negative emissions by 2030, as well. As discussed earlier in this section, energy efficiency and GHG emissions are closely related. The CAAP includes measures that affect energy consumption from transportation sources and building energy systems. Specifically, CAAP Measures T5-A, E1-A, and E3-A identify requirements for new discretionary projects that have a quantifiable reduction in energy consumption. See Section 3.7.3 for a full description of CAAP Measures that are potentially applicable to discretionary projects being proposed in the City.

3.6.3 Thresholds of Significance

In compliance with Appendix G of the State CEQA Guidelines, the project would result in a significant energy impact if it would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The CEQA Guidelines Appendix F (Energy Conservation) also describes how energy conservation should be addressed in EIRs and states, "[CEQA] requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on

avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy." The CEQA Guidelines Appendix F also provides:

> "The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> 1) Decreasing overall per capita energy consumption
> 2) Decreasing reliance on fossil fuels, such as coal, natural gas and oil, and
> 3) Increasing reliance on renewable energy sources."

Specifically, Section II(C) of the CEQA Guidelines Appendix F provides that environmental impacts associated with energy resources may include:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and the requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The proposed project does not involve the construction of residential dwelling units; therefore, the analysis and significance determination contained in response a) focuses on how the project would reduce reliance on fossil fuels and increasing reliance on renewable energy sources.

3.6.4 Impact Discussion

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. Construction activities associated with the proposed project would require the use of heavy-duty, off-road equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Heavy-duty construction equipment would be required to comply with CARB's airborne toxic control measures, which restrict heavy-duty diesel vehicle idling to five minutes. It is estimated that construction activities would consume approximately 50,818 gallons of diesel fuel to power on-site, off-road heavy-duty construction equipment. Worker, vendor, and haul truck trips during construction activities are anticipated to consume 10,286 gallons of gasoline, 9,015 gallons of diesel, and 2,858 kWh of electricity. See Appendix C for fuel consumption calculations, which are based on a fuel consumption factor contained in the CARB Carl Moyer Program Guidelines (2017 Revisions) and fuel consumption rates for on-road vehicles derived from EMFAC2021 V1.0.2 data. Petroleum and electricity use during construction

would be temporary and needed to conduct development activities; therefore, it would not be wasteful or inefficient.

Once operational, the project would consume energy in the form of electricity, which would be used to power building systems, appliances, and lighting throughout the site, and in the form of petroleum (gasoline and diesel), which would be used to power trucks used for warehousing purposes. Employee and visitor trips to the site would also consume gasoline and diesel, and some of those trips could consume electricity (if the vehicle in question is electric or a plug-in electric hybrid). As estimated in CalEEMod, the proposed warehouse is anticipated to consume approximately 2,680,838 kWh per year for onsite building operation and lighting. Based on the project's default trip generation, operational vehicle trips would have been anticipated to consume approximately 44,911 gallons of gasoline, 300,209 gallons of diesel, and 147,934 kWh of electricity on an annual basis, upon its first year of operation. However, with the implementation of Transportation Demand Management (TDM) Program identified in project's Transportation Impact Study, which includes up to a 15% in reduction in VMT from the site, the energy associated with vehicle trips to and from the site would be reduced to approximately 38,897 gallons of gasoline, 300,203 gallons of diesel, and approximately 125,744 kWh of electricity (Kimley Horn, 2023). As described below, operation of the proposed project would not use energy in a wasteful, inefficient, or unnecessary manner.

The proposed project has been designed to minimize the consumption of fossil fuels that would have otherwise been used to power building systems and site lighting, because the project would not be connected to natural gas. Rather, the building systems and lighting would be entirely powered by electricity. The project would also increase its reliance on electricity that comes from renewable sources by enrolling in 3CE Prime (implemented by the City through a Condition of Approval).[8] The proposed project would not include a solar photovoltaic (PV) system at the time of construction, because it would enroll in 3CE Prime; however, the entire roof will be constructed to support a solar panel load of up to four pounds per square foot across the entire roof, which would facilitate the installation of on-site solar PV in the future. The roof would also be constructed of thermoplastic polyolefin (TPO) membrane with high solar reflectance and low absorption, which would help reduce base and peak energy consumption by helping reflect solar energy that otherwise would have warmed the building. Offsite energy consumption would be reduced through the implementation of the project's TDM Program that, as noted previously, is estimated to achieve up to a 15% reduction passenger vehicle VMT (Kimley Horn, 2023). Thus, the project would reduce its reliance on fossil fuels beyond that which is required by the Title 24 Energy Code, and operational mobile sources (e.g., truck and passenger vehicles) would improve from an efficiency standpoint as regulations are implemented and enforced by CARB (i.e., thereby benefiting from actions that would decrease fossil fuel consumption). Further, electrification of the building would serve to reduce fossil fuel consumption from non-Title 24 sources, such as appliances used within the warehouse. Finally, the proposed project would be constructed on a site that is consistent with its General Plan and zoning designations, meaning that considerations regarding, "whether a building should be constructed here at all," "how large it should be," and

[8] 3CE is a Community Choice Aggregate established by local communities to source clean and renewable electricity while retaining the utility provider's traditional role delivering power and maintaining electric infrastructure. 3CE's objective is to reduce GHG emissions through local control of utility scale renewable electricity generation provided at competitive rates. The 3CE Prime option provides carbon-free electricity.

"where it should be located" were evaluated when the General Plan Land Use Map and Zoning Code were updated.

The project would not use energy in a wasteful, inefficient, or unnecessary manner during construction or operation. This impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed under response a), the proposed project would be constructed such that it would exceed the latest CALGreen Code (i.e., by not utilizing natural gas in building systems or appliances), and the project would also be consistent with the City's CAAP (see Section 3.8). Further, relying on electricity (as opposed to natural gas) to power building systems would reduce long-term reliance on non-renewable resources, supporting the state's goal of reducing reliance on fossil fuels and achieving its 2045 carbon neutrality goal. No impact would occur.

3.6.5 References

California Energy Commission (CEC) 2017. 2017 Integrated Energy Policy Report. 2017 IEPR Workshops, Notices and Documents. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report/2017-iepr

2023a. "Electricity Consumption by County." *Electricity Consumption by County.* CEC, Energy Consumption Database. n.d. Accessed March 6, 2023 at http://ecdms.energy.ca.gov/elecbycounty.aspx.

2023b. "Gas Consumption by County." *Gas Consumption by County.* CEC, Energy Consumption Database. n.d. Accessed March 6, 2023 at http://ecdms.energy.ca.gov/gasbycounty.aspx.

3.7 GEOLOGY AND SOILS

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

The following discussion is based in part on a Geotechnical Investigation prepared for the site by Cornerstone Earth Group (Cornerstone), dated May 5, 2022. A copy pf the report is contained in Appendix D of this Initial Study.

3.7.1 Environmental Setting

Regional Geologic Setting

The subject site is located within a large geologic region known as the Coast Ranges geomorphic province, characterized by extensively folded, faulted, and fractured earth materials. These structural features trend in a northwesterly direction and make up the prominent system of northwest-trending mountain ranges separated by straight-sided sediment-filled valleys. The subject site is situated on the north side of the Pajaro Valley, just south of Watsonville Slough and about 0.8 mile north of the Pajaro River. The site is underlain by Holocene-aged (Quaternary) basin deposits, and is underlain by approximately 170 feet of alluvium with roughly 320 feet of Aromas Red Sands of Allan below. Underlying these sands is the Purisima Formation.[9]

Regional Seismicity

Generally, seismicity within California can be attributed to faulting due to regional tectonic movement. This includes the Zayante-Vergeles fault zone, the San Andreas fault, and most parallel and subparallel faulting within the State. The portion of California which includes the subject site is considered seismically active. Seismic hazards on the site can be attributed to potential ground shaking resulting from earthquake events along nearby or more distant faults.

According to regional geologic literature, the closest known late Quaternary faults are the Zayante-Vergeles fault zone and the San Andreas fault, located approximately 3.5 and 6.2 miles east of the site, respectively. The USGS Quaternary Fault Database indicates that the closest mapped traces of the Zayante-Vergeles fault zone and San Andreas fault are located about 2.8 and 5.5 miles east of the subject site, respectively. Several potentially active and pre-Quaternary faults also occur within the regional vicinity. The site is subject to a Maximum Magnitude Event of 7.9 magnitude along the San Andras fault.

Tsunamis and Seiches

The terms tsunami or seiche refer to ocean waves created by undersea fault movement or by a coastal or submerged landslide. Tsunamis may be generated at a great distance from shore or nearby. The waves formed by this displacement raises water levels and velocities when they reach the shoreline, creating tremendous forces as they impact coastal structures.

The project site is located approximately 3-1/4 miles inland from the Monterey Bay shoreline and is at approximately elevation 18 to 24 feet (Cornerstone 2022). The potential for inundation by tsunamis or seiches is considered low based on a review of the most current Tsunami hazard maps.

[9] Professional Service Industries, Inc. Preliminary Geotechnical Engineering Report for the Proposed Industrial Park Development (West Parcel) SWC Ohlone Parkway and Manabe Ow Road, Watsonville, CA. March 23, 2021.

Site Conditions

The Cornerstone report noted that at the time of their field investigation in October 2021, the eastern approximate two-thirds of the project site was covered with crushed concrete, and the western approximate one-third was covered with vegetation. At the time of their site visits in March 2022, additional fill was observed to have been placed across portions of the site. Subsurface borings revealed that the depth of existing fills ranged from approximately 3.5 to 10.5 feet, and consisted of crushed concrete, very dense poorly graded gravel with clay and sand, medium dense to very dense sand with variable amounts of clay and gravel, and very stiff to hard lean clay with variable amounts of sand. Beneath the fills, the borings taken generally encountered soft to very stiff, highly plastic clay with some thin interbedded layers of loose to medium dense silty clay and clayey sand. Medium stiff lean clay was encountered from a depth of approximately 34.5 to 42 feet, and medium dense silt with sand was encountered from approximately 42 to 45 feet. Medium dense silty sand was encountered at depths from approximately 46.5 to 51.5 feet.

The results of cone penetration tests (CPTs) conducted by Cornerstone were generally consistent with previous CPTs conducted on the adjacent 200 Manabe Ow site to the west by Professional Service Industries, Inc. (PSI) in 2021. Generally stiff to very stiff clays with interbedded layers of loose to dense sands were correlated with the adjacent PSI borings to the maximum depth explored of 100 feet below the ground surface at the time of the Cornerstone borings. Larger dense to very dense sand layers were encountered at depths ranging from approximately 70 to 100 feet.

3.7.2 Regulatory Setting

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. There are no Alquist-Priolo earthquake fault zones on the project site (California Geological Survey, 1974).

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was passed in 1990 following the Loma Prieta earthquake to reduce threats to public health and safety and to minimize property damage caused by earthquakes. The act directs the U.S. Department of Conservation to identify and map areas prone to the earthquake hazards of liquefaction, earthquake-induced landslides, and amplified ground shaking. The act requires site-specific geotechnical investigations to identify potential seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy within the Zones of Required Investigation.

California Building Code

The 2019 California Building Codes (CBC) covers grading and other geotechnical issues, building specifications, and non-building structures.

California Public Resources Code - Paleontology

Section 5097 of the Public Resources Code specifies the procedures to be followed in the event of the unexpected discovery of historic, archaeological, and paleontological resources, including

human remains, historic or prehistoric resources, paleontological resources on nonfederal land. The disposition of disposition of paleontological discoveries falls within the jurisdiction of the California Native American Heritage Commission (NAHC). Section 5097.5 of the Code states the following:

> *"No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor."*

Watsonville 2005 General Plan

The following are relevant policies and implementation measures within the City's Public Safety Element of the 2005 General Plan:

Policy 12.B Seismic Hazards

Implementation Measure 12.B.1 Geologic Review – The City may require a geo-technical report prepared by a registered professional prior to the issuance of a building permit.

Implementation Measure 12.B.2 Structural Design – The City shall place structural design conditions on new development to ensure that recommendations of the geo-technical evaluation are implemented.

Policy 12.C Soil Constraints

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

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

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

Implementation Measure 12.C.5 Final Soil Grade – The City shall require that soil grading blend with natural topography and that final cut slopes shall be no steeper than three horizontal to one vertical (33 percent).

3.7.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the project would have a significant impact related to geology and soils if it would:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;

   ii. Strong seismic ground shaking;

   iii. Seismic-related ground failure, including liquefaction; or

   iv. Landslides;

b) Result in substantial soil erosion or the loss of topsoil;

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; or

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

3.7.4 Impact Discussion

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault?

No Impact. According to the Alquist-Priolo Special Studies Zones Act of 1972 (revised 1994), active faults are those that have been shown to display surface rupture during the last 11,000 years (i.e., Holocene time). The project site is not currently situated within a mapped Earthquake Fault Zone, and there are no known fault traces crossing the site, therefore fault surface rupture is not considered a significant geologic hazard at the site.

ii) Strong seismic ground shaking?

Less than Significant Impact. The site will be affected by seismic shaking as a result of earthquakes on major active faults located throughout the northern California area. The nearest State-considered active faults within 15 miles of the project site include the Zayante-Vergeles (2.8

miles), San Andreas (5.5 miles), Sargent (9.3 miles), and Monterey Bay-Tularcitos (14.4 miles). As part of the current 2019 California Building Code (CBC), the design of structures must consider dynamic forces resulting from seismic events. These forces are dependent upon the magnitude of the earthquake event as well as the properties of the soils that underlie the site. As part of the procedure to evaluate seismic forces, the code requires the evaluation of the Seismic Site Class, which categorizes the site based upon the characteristics of the subsurface profile within the upper 100 feet of the ground surface. The Cornerstone report used a peak ground acceleration factor of 0.87g for their ground motion hazard analysis, following the CBC procedure. Per General Plan Implementation Measure 12.B. 2 Structural Design, the project will be required to adhere to the recommendations contained in the report and all subsequent geotechnical reports affecting project design and construction. Adherence to these recommendations would result in a less than significant impact due to strong seismic groundshaking.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction occurs when loose, saturated sandy soils lose strength and flow like a liquid during earthquake shaking. Ground settlement often accompanies liquefaction. Soils most susceptible to liquefaction are saturated, loose, silty sands, and uniformly graded sands. While the project site is located in an identified Liquefaction Potential zone on the City of Watsonville Liquefaction Potential map (City of Watsonville 2012), it is not currently mapped as being in a State-designated Liquefaction Hazard Zone study area. However, Cornerstone's CPT program addressed liquefaction potential on the site by testing potentially liquefiable layers to depths of at least 50 feet, performing visual classification on sampled materials, evaluating CPT data, and performing various tests to further classify soil properties.

Several sand layers were encountered by Cornerstone below the design groundwater depth of three feet below existing fills or natural ground surface. These layers were analyzed for liquefaction triggering and potential post-liquefaction settlement. The analyses indicated that several layers could potentially experience liquefaction triggering that could result in post-liquefaction total settlement at the ground on the order of up to approximately 1/3-inch. Differential movement for level ground sites over deep soils sites would be up to approximately 2/3 of the total settlement between independent foundation elements. Thus, it was estimated by Cornerstone that differential settlements would be on the order of approximately 1/4-inch between foundation elements estimated to be over a horizontal distance of 50 or 60 feet. Cornerstone concluded that the existing non-liquefiable layer, which ranges from 23 to 45 feet deep, is sufficient to prevent ground deformation and significant surficial cracking, and that therefore the estimated amount of settlement is reasonable.

Loose to medium dense unsaturated sandy soils can settle during strong seismic shaking. Cornerstone evaluated the potential for seismic compaction of the unsaturated sands, and concluded that the potential for significant seismic settlement affecting the proposed improvements is low.

Based on the findings of the Cornerstone report for seismic-related ground failure described above, the project would have a less than significant impact.

iv) Landslides?

No Impact. Earthquake-induced landslides and slope stability risks are low because the site is relatively flat. Areas surrounding the site are also flat.

b) Result in significant soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the project would disturb the ground and expose soils, thereby increasing the potential for wind- and water-related erosion and sedimentation at the site until the completion of construction and ground disturbance is stabilized. As discussed in Section 3.10 Hydrology and Water Quality, the proposed project would implement erosion control measures during and after construction consistent with the Construction General Permit and ESCP requirements. Compliance with these requirements would ensure the project would not result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. As discussed above, the project site is not located within the vicinity of a slope that could be affected by a landslide. The project site is located in an identified Liquefaction Potential zone on the City of Watsonville Liquefaction Potential map (City of Watsonville 2012), however, it is not currently mapped as being in a State-designated Liquefaction Hazard Zone study area (Cornerstone 2022). Cornerstone evaluated liquefaction potential at the site by analyzing on site soils. The analysis revealed layers of soil below the project site that could potentially experience liquefaction resulting in post-liquefaction total settlement at the ground floor on the order of up to about 1/3 inch. Differential settlements are anticipated to be on the order of ¼ inch between foundation elements and estimated to be over a horizontal distance of 50 to 60 feet. Therefore, the project would not result in on- or off-site landslide, subsidence, liquefaction, or collapse.

Lateral spreading involves the horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water, and is typically associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. Watsonville Slough runs parallel to the site approximately 100 to 120 feet north of the project site. Based on field observations, Cornerstone estimated that the channel bottom of the slough ranges from approximately 10 to 13 feet below the northern site boundary grades. As part of the liquefaction analysis, they calculate the Lateral Displacement Index (LDI) for potentially liquefiable layers. LDI is a summation of the maximum shear strength versus depth, which is a measurement of the potential maximum displacement at that exploration location. The estimated displacements based on LDI calculations were considered negligible. The project would therefore not result in lateral spreading risks.

d) Be located on expansive soil, as noted in the 2010 California Building Code, creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. According to the Cornerstone report, the existing fills that generally blanket the site are low to moderately expansive, and the native soils beneath the fills

are highly expansive. Expansive soils can undergo significant volume change with changes in moisture content. They shrink and harden when dried and expand and soften when wetted.

To reduce the potential for damage to the planned structure, the Cornerstone report recommends that slabs-on-grade should have sufficient reinforcement and be supported on a layer of non-expansive fill; footings should extend below the zone of seasonal moisture fluctuation. In addition, it is important to limit moisture changes in the surface soils by using positive drainage away from the proposed building as well as limiting landscape watering. The Cornerstone report contains additional detailed grading and building foundation recommendations to address the risks posed by the existing expansive soil conditions on the site. Per General Plan Implementation Measure 12.B.2 Structural Design, the project will be required to adhere to the recommendations contained in the Geotechnical Investigation report and all subsequent geotechnical reports affecting project design and construction. Implementation of these recommendations would result in a less than significant impact.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed building would connect to the City's sanitary sewer system and would not use septic tanks or other alternative wastewater disposal systems. Therefore, no impacts related to septic systems would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. Paleontological resources, or fossils, are any evidence of past life, including remains, traces, and imprints of once-living organisms preserved in rocks and sediments and provide information about the history of life on earth dating back billions of years ago. According to the Society of Vertebrate Paleontology, significant paleontological resources include fossils of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils. Fossils are nonrenewable paleontological resources that are afforded protection by federal, State, and local environmental laws and regulations (Paleontological Resources Preservation Act). Accordingly, the potential of a particular area to produce a valuable paleontological resource is largely dependent on the geologic age and origin of the underlying rocks.

The Cornerstone report notes that the project site is currently underlain by approximately 3.5 to 10.5 feet of imported fill underlain by Holocene-era basin and alluvial deposits. These deposits, due to their age (within the last 12,000 years) are unlikely to yield significant paleontological resources. Implementation of the Standard Design and Construction measure would ensure that the proposed project would not significantly impact paleontological resources.

3.7.5 References

City of Watsonville. Liquefaction Potential Map. Watsonville GIS Center. February 5. Accessed March 8, 2023 at https://www.cityofwatsonville.org/DocumentCenter/View/2564/Liquefaction-Potential-Map?bidId=

Cornerstone Earth Group. Geotechnical Investigation – Ohlone Parkway Industrial Facility. May 5, 2022.

Professional Service Industries, Inc. 2021. Preliminary Geotechnical Engineering Report for the Proposed Industrial Park Development (West Parcel) SWC Ohlone Parkway and Manabe Ow Road, Watsonville, CA. March 23, 2021.

3.8 GREENHOUSE GAS EMISSIONS

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

3.8.1 Environmental Setting

Gases that trap heat in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). Many chemical compounds found in the earth's atmosphere exhibit the GHG property. GHGs allow sunlight to enter the atmosphere freely. When sunlight strikes the earth's surface, it is either absorbed or reflected back toward space. Earth that has absorbed sunlight warms up and emits infrared radiation toward space. GHGs absorb this infrared radiation and "trap" the energy in the earth's atmosphere. Entrapment of too much infrared radiation produces an effect commonly referred to as "Global Warming," although the term "Global Climate Change" is preferred because effects are not just limited to higher global temperatures.

GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change.

Human production of GHG has increased steadily since pre-industrial times (approximately pre-1880) and atmospheric carbon dioxide concentrations have increased from a pre-industrial value of 280 parts per million (ppm) in the early 1800's to 420 ppm in February 2023 (NOAA, 2023). The effects of increased GHG concentrations in the atmosphere include increasing temperature, shifts in precipitation patterns and amounts, reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHGs are the primary GHGs emitted into the atmosphere by human activities. The six common GHGs are described below.

- *Carbon Dioxide (CO_2)* is released to the atmosphere when fossil fuels (oil, gasoline, diesel, natural gas, and coal), solid waste, and wood or wood products are burned.
- *Methane (CH_4)* is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in municipal solid waste landfills and the raising of livestock.
- *Nitrous oxide (N_2O)* is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels.
- *Sulfur hexafluoride (SF_6)* is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF_6 occur during maintenance and servicing as well as from leaks of electrical equipment.
- *Hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs)* are generated in a variety of industrial processes.

GHG emissions from human activities contribute to overall GHG concentrations in the atmosphere and the corresponding effects of global climate change (e.g., rising temperatures, increased severe weather events such as drought and flooding). GHGs can remain in the atmosphere long after they are emitted. The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO_2, which has a GWP of one. By comparison, CH_4 has a GWP of 25, which means that one molecule of CH_4 has 25 times the effect on global warming as one molecule of CO_2. Multiplying the estimated emissions for non-CO_2 GHGs by their GWP determines their carbon dioxide equivalent (CO_2e), which enables a project's combined global warming potential to be expressed in terms of mass CO_2 emissions. GHG emissions are often discussed in terms of Metric Tons of CO_2e, or $MTCO_2e$.

3.8.2 Regulatory Setting

California Air Resources Board (CARB) is the lead agency for implementing Assembly Bill (AB) 32, the California Global Warming Solutions Act adopted by the Legislature in 2006. AB 32 requires the CARB to prepare a Scoping Plan containing the main strategies that will be used to achieve reductions in GHG emissions in California.

Executive Order B-30-15, 2030 Carbon Target and Adaptation, issued by Governor Brown in April 2015, sets a target of reducing GHG emissions by 40 percent below 1990 levels in 2030. By directing state agencies to take measures consistent with their existing authority to reduce GHG emissions, this order establishes coherence between the 2020 and 2050 GHG reduction goals set by AB 32 and seeks to align California with the scientifically established GHG emissions levels needed to limit global warming below two degrees Celsius.

To reinforce the goals established through Executive Order (EO) B-30-15, Governor Brown went on to sign SB 32 and AB 197 on September 8, 2016. Senate Bill 32 made the GHG reduction target to reduce GHG emissions by 40 percent below 1990 levels by 2030 a requirement as opposed to a goal. Assembly Bill 197 gives the Legislature additional authority over CARB to ensure the most successful strategies for lowering emissions are implemented, and requires CARB to, "protect the state's most impacted and disadvantaged communities …[and] consider the social costs of the emissions of greenhouse gases."

Governor Brown issued EO B-15-18 on September 10, 2018, which directs the State to achieve carbon neutrality as soon as possible, no later than 2045, and achieve and maintain net negative emissions thereafter. On September 16, 2022, Governor Newson signed into law AB 1279, the California Climate Crisis Act, which codified California's 2045 carbon neutrality goal and established a GHG emission reduction target of 85% below 1990 levels.

CARB Scoping Plan

AB 32 requires the CARB to prepare a Scoping Plan containing the main strategies that will be used to achieve reductions in GHG emissions in California.

In 2007, CARB approved a statewide 1990 emissions level and corresponding 2020 GHG emissions limit of 427 million metric tons of carbon dioxide equivalents ($MTCO_2e$) (CARB, 2007). In 2008, CARB adopted its *Climate Change Scoping Plan*, which projects, absent regulation or under a "business as usual" (BAU) scenario, 2020 statewide GHG emissions levels of 596 million $MTCO_2e$ and identifies the numerous measures (i.e., mandatory rules and regulations and voluntary measures) that will achieve at least 174 million $MTCO_2e$ of reductions and reduce statewide GHG emissions to 1990 levels by 2020 (CARB, 2009). In 2011, CARB released a supplement to the 2008 *Scoping Plan Functional Equivalent Document* (FED) that included an updated 2020 BAU statewide GHG emissions level projection of 507 million $MTCO_2e$ (CARB, 2011), and in 2014 CARB adopted its First Update to the Climate Change Scoping Plan (CARB, 2014). On December 14, 2017, CARB adopted the second update to the Scoping Plan, the *2017 Climate Change Scoping Plan Update* (*2017 Scoping Plan Update*). The primary objective of the *2017 Scoping Plan Update* is to identify the measures needed to achieve the mid-term GHG reduction target for 2030 (i.e., reduce emissions by 40 percent below 1990 levels by 2030), as established under Executive Order B-30-15 and SB 32.

In December 2022, CARB adopted the *2022 Scoping Plan,* which outlines the State's strategy for achieving carbon neutrality by 2045. The *2022 Scoping Plan* identifies a technologically feasible, cost effective, and equity focused path for achieving the State's climate targets for 2030 (under SB 32) and 2045 (under AB1279). The continued implementation of existing plans, policies, and regulations adopted for the purposes of reducing GHG emissions remain critical for achieving the State's 2030 and 2045 GHG reduction goals. For example, the *2022 Scoping Plan* identifies a goal of achieving a per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and a 30 percent below 2019 levels by 2045, which is related to the implementation of SB 375. The *2022 Scoping Plan* also puts a strong emphasis on measures that will decarbonize activities and emissions from existing and proposed land uses, and capture and store carbon in the atmosphere though man-made (e.g., machinery) and natural (e.g., sequestration) processes.

2040 Metropolitan Transportation Planning/Sustainable Communities Strategy

AMBAG is the Metropolitan Planning Organization responsible for preparing the region's Sustainable Communities Strategy (SCS), in compliance with SB 375. The SCS is developed as part of regional transportation planning and is incorporated in the Metropolitan Transportation Plan prepared for the AMBAG region. The most recent plan adopted by AMBAG is the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (AMBAG, 2018). The 2040 MTP/SCS sets forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies,

is intended to reduce GHG emissions from passenger vehicles and light duty trucks to achieve the regional GHG reduction targets set by CARB.

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

City of Watsonville Climate Action and Adaptation Plan

The City of Watsonville City Council adopted the Climate Action and Adaptation Plan (CAAP) in October 2021. The CAAP identifies 19 strategies, 33 implementation measures, and 61 supporting efforts to help the City achieve its aggressive target of reducing GHG emissions by 80 percent below 1990 levels, by 2030, and to also have net-negative emissions by 2030, as well. The CAAP Measures primarily focus on the transportation, energy, wastewater, solid waste sectors, with additional, minor reductions coming from new green space. While many of the CAAP Measures focus on actions the City would undertake, a total of 11 measures are relevant and potentially applicable to discretionary projects that are being proposed within the city. These potentially applicable CAAP Measures include the following:

- **Measure T2-A: New Pedestrian Improvements.** Require new development projects, residential and non-residential, to provide pedestrian improvements along street frontages; and strongly encourage connection to the nearest existing pedestrian facilities, such as sidewalks or trails. Developments shall also include internal pedestrian connections between all uses.
- **Measure T2-B: Pedestrian and Cyclist Multimodal Enhancements.** Improve roadway segments, intersections, and bikeways to implement multimodal enhancements for pedestrian and cyclist comfort and safety along City-maintained public roads by improving five centerline miles of roadway segments and 100 intersections by 2030.

  Projects may include but not be limited to the following projects identified for Watsonville in the AMBAG 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS):

  - Traffic calming and greenway features on 2nd Street/Maple Avenue and 5th Street from Lincoln Street to Walker Street
  - Bike lane improvements to Rodriguez Street (Main Street to Riverside Drive)
  - Addition of sharrows to Union/Brennan (Freedom Boulevard to Riverside Drive)
  - Improvement to the crosswalks on Union Street/Brennan Street
  - Pedestrian and bicycle enhancements on Main Street (Freedom Boulevard to Riverside Drive) and Freedom Boulevard (Green Valley Road to Davis Avenue)
  - Exploration of implementing universal streets in the Downtown Area
  - Complete streets improvements to Main Street (East Beach Street to Freedom Boulevard)
  - Construction of pedestrian/bicycle bridge over Highway 1
  - Installation of a roundabout to replace the currently signalized intersection at Main Street (Highway 152)/Freedom Boulevard with safety considerations for bike/pedestrian improvements

  - Freedom Boulevard reconstruction (Alta Vista Avenue to Green Valley Road) for pedestrian improvements
- **Measure T2-C: Trails and Bicycle Master Plan.** New pedestrian and bicycle infrastructure may include, but not be limited to: Coastal Rail Trail Segments 17 and 18, Lee Road Trail, Pajaro Valley High School Connector Trail, Pajaro River Levee Trail, and projects identified in the AMBAG 2040 MTP/SCS. Additionally, there may be bicycle improvements for Harkins Slough Road, Green Valley Road, State Route 129, and State Route 152. Pedestrian improvements may include sidewalk infill on Harkins Slough Road and Main Street, pedestrian bridge over Highway 1 to Pajaro Valley High School, and various intersection improvements.
- **Measure T5-A: Commute Trip Reduction Programs.** Update the City's Green Business Program to include commute trip reduction programs. Provide incentives and education to existing and future employers to participate in the program, particularly to implement commute trip reduction programs. The City shall track participating businesses to achieve a 20 percent participation City-wide. Commute trip reduction programs may include but not be limited to ride-sharing programs, subsidized transit, vanpool/shuttles, and alternative work schedules.
- **Measure T5-B: End-of-Trip Facilities.** Update Watsonville Municipal Code, Section 14-17.113, to require new non-residential development to provide end-of-trip facilities for employee use in addition to bicycle parking. End-of-trip facilities will include bike parking, bike lockers, showers, and personal lockers to the extent feasible.
- **Measure T5-F: Active Transportation Routes to School.** Continue to implement the Complete Streets to Schools Plan to improve active transportation routes to schools to increase use of active transportation for school commutes by 5 percent by 2030. Proposed improvements include but are not limited to new sidewalks, improved signage and street markers, sidewalk improvements, lighting improvements, and crosswalk improvements.
- **Measure E1-A: Natural Gas Reduction in New Development.** Require a 50 percent reduction in natural gas consumption compared to business- as-usual (BAU) in all new development through electric-only development and installation of electric or more efficient natural gas home heating and cooling systems, appliances, or water heaters. Explore implementation of an all-electric ordinance to achieve all-electric new development by 2030.
- **Measure E3-A: 3CE Customer Participation.** Increase participation in 3CE Prime, with the goal of 50 percent of all residential and non-residential customers choosing 3CE Prime by 2030.

  3CE is a Community Choice Energy agency established by local communities to source clean and renewable electricity while retaining the utility provider's traditional role delivering power and maintaining electric infrastructure. 3CE's objective is to reduce GHG emissions through local control of utility scale renewable electricity generation provided at competitive rates. The 3CE Prime option provides carbon-free electricity.
- **Measure E4-A: Cool Roofs for New Development.** Require installation of cool roof technology for new commercial, municipal, and multi-family residential projects to achieve at least 50 percent cool roofs in new development. A cool roof treatment, green space, or photovoltaic panels would qualify for compliance with this measure.
- **Measure SW1-A: Organic Waste Diversion.** Continue to expand and promote local composting and food waste diversion programs in accordance with SB [Senate Bill] 1383 to achieve 75 percent diversion of all organic waste by 2030.

- **Measure NW1-B: Tree Planting.** Continue to implement the Watsonville Urban Greening Plan, with the goal of planting 300 trees per year.

The CAAP is a "qualified" GHG emissions reduction plan pursuant to CEQA Guidelines Section 15183.5 and, thusly, projects that demonstrate consistency with the CAAP can streamline their analysis of GHG emissions under CEQA. The City utilizes consistency with the CAAP as CEQA threshold of significance; projects that demonstrate consistency with the CAAP are not considered to have a cumulatively considerable impact related to GHG emissions, and additional project-specific GHG analysis is not required.

City of Watsonville Municipal Code

Municipal Code Section 6-10.102 ((b) Requirements for Commercial Businesses, including Multifamily Residential Dwellings states that generators that are commercial businesses, including multifamily residential dwellings, shall:

> (1) Subscribe to the City's three- and three-plus-container collection services and comply with requirements of those services as described in subsection (b)(2) of this section, except commercial businesses that meet the self-hauler requirements in this chapter. The City shall have the right to review the number and size of a generator's containers and frequency of collection to evaluate adequacy of capacity provided for each type of collection service for proper separation of materials and containment of materials; and, commercial businesses shall adjust their service level for their collection services as requested by the City.
> (2) Except commercial businesses that meet the self-hauler requirements in subsection (f) of this section, participate in the City's organic waste collection service(s) by placing designated materials in designated containers as described below.
> (i) A three- and three-plus-container collection service (blue container, green container, and gray container).
> (ii) Generator shall place source separated green container organic waste, including food waste, in the green container; source separated recyclable materials in the blue container; and gray container waste in the gray container. Generator shall not place materials designated for the gray container into the green container or blue container.
> (3) Supply and allow access to adequate number, size and location of collection containers with sufficient labels or colors (conforming with subsections (b)(4)(i) and (b)(4)(ii) of this section) for employees, contractors, tenants, and customers, consistent with the City's blue container, green container, and gray container collection service or, if self-hauling, per the commercial business's instructions to support its compliance with its self-haul program, in accordance with subsection (f) of this section.
> (4) Excluding multifamily residential dwellings, provide containers for the collection of source separated green container organic waste and source separated recyclable materials in all indoor and outdoor areas, where disposal containers are provided for customers, for materials generated by that business. Such containers do not need to be provided in restrooms. If a commercial business does not generate any of the materials that would be collected in one (1) type of container, then the business does not have to provide that particular container in all areas where disposal containers are provided for customers. Pursuant to 14 CCR Section 18984.9(b), the containers provided by the business shall have either:

(i) A body or lid that conforms with the container colors provided through the collection service provided by the City, with either lids conforming to the color requirements or bodies conforming to the color requirements or both lids and bodies conforming to color requirements. A commercial business is not required to replace functional containers, including containers purchased prior to January 1, 2022, that do not comply with the requirements of this subsection prior to the end of the useful life of those containers, or prior to January 1, 2036, whichever comes first; or

(ii) Container labels that include language or graphic images, or both, indicating the primary material accepted and the primary materials prohibited in that container, or containers with imprinted text or graphic images that indicate the primary materials accepted and primary materials prohibited in the container. Pursuant to 14 CCR Section 18984.8, the container labeling requirements are required on new containers commencing January 1, 2022.

(5) Multifamily residential dwellings are not required to comply with container placement requirements or labeling requirements in subsection (b)(4) of this section pursuant to 14 CCR Section 18984.9(b).

(6) To the extent practical through education, training, inspection, and/or other measures, excluding multifamily residential dwellings, prohibit employees from placing materials in a container not designated for those materials per the City's blue container, green container, and gray container collection service or, if self-hauling, per the commercial business's instructions to support their compliance with their self-haul program, in accordance with subsection (f) of this section.

(7) Excluding multifamily residential dwellings, periodically inspect blue containers, green containers, and gray containers for contamination and inform employees if containers are contaminated and of the requirements to keep contaminants out of those containers pursuant to 14 CCR Section 18984.9(b)(3).

(8) Annually provide information to employees, contractors, tenants, and customers about organic waste recovery requirements and about proper sorting of source separated green container organic waste and source separated recyclable materials.

(9) Provide education information before or within fourteen (14) days of occupation of the premises to new tenants that describes requirements to keep source separated green container organic waste and source separated recyclable materials separate from gray container waste (when applicable) and the location of containers and the rules governing their use at each property.

(10) Provide or arrange access for the City or its agent to their properties during all inspections conducted in accordance with subsection (f) of this section to confirm compliance with the requirements of this chapter.

(11) Accommodate and cooperate with the City's remote monitoring program for inspection of the contents of containers for prohibited container contaminants, which may be implemented at a later date, to evaluate generator's compliance with subsection (b)(2) of this section. The remote monitoring program may involve installation of remote monitoring equipment on or in the blue containers, green containers, and gray containers or hauler's vehicles.

(12) At commercial business's option and subject to any approval required from the City, implement a remote monitoring program for inspection of the contents of its blue containers, green containers, and gray containers for the purpose of monitoring the contents of containers to determine appropriate levels of service and to identify prohibited container contaminants. Generators may install remote monitoring devices on or in the

blue containers, green containers, and gray containers subject to written notification to or approval by the City or its designee.
(13) If a commercial business wants to self-haul, meet the self-hauler requirements in subsection (f) of this section.
(14) Nothing in this section prohibits a generator from preventing or reducing waste generation, managing organic waste on site, or using a community composting site pursuant to 14 CCR Section 18984.9(c).
(15) Commercial businesses that are tier one or tier two commercial edible food generators shall comply with food recovery requirements, pursuant to subsection (d) of this section.

3.8.3 Thresholds of Significance

In compliance with Appendix G of the State CEQA Guidelines, the project would result in a significant GHG impact if it would:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Global climate change is the result of GHG emissions worldwide; individual projects do not generate enough GHG emissions to influence global climate change. Thus, the analysis of GHG emissions is by nature a cumulative analysis focused on whether an individual project's contribution to global climate change is cumulatively considerable.

The Monterey Bay Air Resources District (MBARD), as the regional air agency for the Basin, has air-permitting authority in Santa Cruz County. As of June 2022, MBARD has not adopted recommended GHG significance thresholds applicable to development projects, and instead recommends the use of GHG thresholds adopted by other air districts in California, such as the Sacramento Metropolitan Air Quality Management District and the Bay Area Air Quality Management District (BAAQMD).

On April 20, 2022, the BAAQMD adopted new thresholds of significance for GHG emissions that address emissions through the Year 2030. For project-level assessments, the BAAQMD's updated GHG thresholds provide two options for assessing the significance of a project's GHG emissions, as presented below.

A. Projects must include, at a minimum, the following project design elements:
    1. Buildings
        a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
        b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    2. Transportation
        a. Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

b. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
   i. Residential projects: 15 percent below the existing VMT per capita
   ii. Office projects: 15 percent below the existing VMT per employee
   iii. Retail projects: no net increase in existing VMT

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

The analysis contained under responses a) and b) below utilize a multi-threshold approach for evaluating the significance of the proposed project's emissions. The project is evaluated for consistency with the City's CAAP, a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b), consistent with Option B of the BAAQMD's updated project-level thresholds, and other plans, policies, and regulations adopted for the purposes of reducing GHG emissions (i.e., the CARB *2022 Scoping Plan* and AMBAG 2040 MTP/SCS).

3.8.4 Impact Discussion

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The proposed project would generate GHG emissions from both short-term construction and long-term operational activities. Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from heavy-duty off-road equipment operating within the project site during site preparation, grading, building construction, paving, and architectural coating activities. Construction activities would cease to emit GHGs upon completion, unlike operational emissions that continue year after year until the commercial building constructed as part of project closes or ceases operation. Once operational, the proposed project would generate GHG emissions from the area and mobile sources described in Section 3.3.4, as well as electricity consumption, water use and wastewater generation, and solid waste generation.

As described under Section 3.8.3, MBARD does not have adopted GHG significance thresholds but rather recommends utilizing the significance thresholds of other air districts, such as the BAAQMD. Accordingly, this analysis utilizes a project-consistency analysis with the City's CAAP as the basis for assessing the significance of the proposed project's GHG emissions. This approach is consistent with Option B of the BAAQMD's GHG emissions significance thresholds, which were adopted in April 2022 and address GHG emission through Year 2030, and with Guidelines Section 15183.5(b). Table 3.8-1 below presents the project's consistency analysis with the CAAP; see also Appendix F for the project's CAAP Consistency Checklist, which is used by the City to track project compliance with CAAP Measures.

Table 3.8-1 Project Consistency Analysis with CAAP	
CAAP Measure	**Consistency Analysis**
Measure T2-1: New Pedestrian Improvements & Measure T2-B: Pedestrian and Cyclist Multimodal Enhancements	*Consistent.* The project would be located at the junction of Manabe Ow Road and Ohlone Parkway. Pedestrian walkways exist along the portions of the project site that would be adjacent to Manabe Ow Road and the northeastern portion of the site adjacent to Ohlone Parkway. The proposed project would improve existing pedestrian facilities along the entirety of Ohlone Parkway adjacent to the parking lot by constructing a sidewalk and adding street lighting. The project site would also provide short- and long-term bike parking on the northeast corner of the building.
Measure T2-C: Trails and Bicycle Master Plan	*Consistent.* The project would not conflict with the future implementation of identified enhancements in the AMBAG 2040 MTP/SCS. No new roadway improvements near the project site are needed, in that (a) the existing intersection at Ohlone Parkway / Manabe Ow Road has ADA compliant ramps and (b) the portions of Ohlone Parkway and Manabe Ow Road along the project frontage have a bike lane. The proposed project would improve Ohlone Parkway so that a sidewalk would extend along the full extent of the roadway adjacent to the project site.
Measure T5-A: Commute Trip Reduction Programs	*Consistent.* The proposed project would implement a TDM program, which would reduce VMT by approximately 15 percent, and address an additional approximately 6.9 percent of its VMT via a VMT Mitigation Banking Program. Cumulatively, the project would address approximately 21.9 percent of its VMT through TDM Measures and VMT Mitigation Banking Fees. The TDM Measures proposed for the project include a travel behavior change program, preferential carpool parking spaces, telecommuting, alternative work schedule, bike share, bicycle parking in excess of code, showers/changing rooms, and pedestrian network improvements.
Measure T5-B: End-of-Trip Facilities	*Consistent*. The project plans include the installation of eight (8) short-term bike stalls on the northeast side of the building, two (2) short-term bike racks on the northwest side of the building, and 10 long-term bike lockers in the office area of the building.
Measure T5-F: Active Transportation Routes to School	*Not Applicable*. The project involves the development of a warehouse. As such, the project would provide neither dwelling units nor school-age children.
Measure E1-A: Natural Gas Reduction in New Development	*Consistent*. Natural gas would not be brought into the site from the street. No gas fired equipment nor gas appliances are included in the project. In addition, unit space heating would be powered by electricity.
Measure E3-A: 3CE Customer Participation	*Consistent.* Future tenants of operators of the project would be required to enroll in 3CE Prime, and the City would enforce this

Table 3.8-1 Project Consistency Analysis with CAAP	
CAAP Measure	**Consistency Analysis**
	requirement as a condition of approval. The project would also incorporate infrastructure for future installation of a PV solar panel system on the roof of the warehouse and the building would be designed to be all-electric. The entire roof would be constructed to support a solar panel load of four pounds per square foot, which could support additional solar panels beyond the 27,000 square feet of space currently identified in the plan set.
Measure E4-A: Cool Roofs for New Development	*Consistent*. The roof would be constructed with a thermoplastic polyolefin (TPO) roof membrane with high solar reflectance and low absorption across the entire roof.
Measure SW1-A: Organic Waste Diversion	*Consistent*. The City would require the project applicant and/or the project's tenants, lessees, and/or occupants to implement an organic waste diversion program as part of its solid waste service. This would be enforced per Municipal Code Section 6-10.102 as a Condition of Approval for the project. The project's organic waste diversion program would be dependent on the volume of solid and organic waste generated by the facility and the facility's eligibility for participation in City and/or waste hauler organic waste programs. The final program would consist of either: 1) Participation in the City's food scraps collection program; or 2) Development of an on-site composting program.
Measure NW1-B: Tree Planting	*Consistent*. The project's planting plan identifies approximately 143,308 square feet of landscaped / bio retention areas. The site is generally void of trees; thus, the project would increase the amount of greenspace at the site.

As shown in Table 3.8-1, the project would be consistent with applicable CAAP Measures, and therefore would not conflict with it. Accordingly, the project meets the significance criteria maintained by the BAAQMD and the project is eligible for GHG emission streamlined review under Guidelines Section 15183.5(b). It should further be highlighted that the project would not construct natural gas infrastructure to the project site, and therefore would not use natural gas for building systems or appliance use. Foregoing the construction of natural gas infrastructure to new development has been identified as a critical element to achieving the State's carbon neutrality goal by 2045 (CEC 2021). As described below, the Project would also be consistent with the *CARB 2022 Scoping Plan* and AMBAG 2040 MTP/SCS.

The *2022 Scoping Plan* presents a scenario for California to meet the State goal of reducing GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045 (CARB 2022c). Specifically, the *2022 Scoping Plan*:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.

- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.

Many of the measures identified in the *2022 Scoping Plan Update* are not applicable at the proposed project's level; rather, the success of the plan primarily relies upon the State's actions to uphold and implement existing legislation and develop new plans and strategies to sequester, trap, and store emitted carbon emissions. Although most of these measures would be implemented at the State level, the GHG reductions achieved by these state measures would be realized at the local level. For example, regardless of actions taken by the City Watsonville or County of Santa Cruz, emissions generated through gasoline combustion in motor vehicles within the county would produce less GHG in 2030 than they do now. Similarly, the electricity consumed by on-site sources (e.g., lighting, building systems, etc.) would become greener over time as the State's RPS increases, consistent with the benchmarks established in SB 100 and SB 1020. Because the project would be designed without natural gas plumbing and infrastructure, it would also help advance the state's goal of decarbonizing emissions from the building sector. The project would also be consistent with vehicle miles traveled (VMT) guidelines outlined in Senate Bill (SB) 743, as discussed in Section 3.17, Transportation.

Regarding consistency with the AMBAG 2040 MTP/SCS, as described under Section 3.14, Population and Housing, the proposed project is within the growth forecasts of the 2040 MTP/SCS. Therefore, the growth (and associated traffic) facilitated under implementation of the proposed project has been accounted for in the 2040 MTP/SCS's growth projections, and the project would be consistent with the 2040 MTP/SCS. Further, as identified earlier, the project is consistent with VMT guidelines outlined in SB 743. The project would not impede any regional or local transportation projects identified in the 2040 MTP/SCS (see Table 3.8-1, Measure T2-C), would implement a TDM Program to address approximately 21.9 percent of the Project's VMT (see Table 3.8-1, Measure T5-A), with 15% of that reduction coming from project's on-site VMT, and would include facilities that would encourage non-vehicular modes of transportation (see Table 3.8-1, Measure T5-B). The project would be consistent with the AMBAG 2040 MTP/SCS.

As described above, the project would be consistent with the City's CAAP, the *CARB 2022 Scoping Plan*, and AMBAG 2040 MTP/SCS. The project would generate GHG emissions but not in a manner that they would have a significant effect on the environment, because it is consistent with plans adopted at the local-, regional-, and state-level for the purposes of reducing GHG emissions. This impact would be less than significant.

3.8.5 References

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3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

3.9.1 Environmental Setting

The project site is located at 100 Manabe Ow Road, (APNs 018-711-35 and -37) at the southwest corner of the intersection of Manabe Ow Road and Ohlone Parkway in the southwest portion of the City. California State Route 1 (SR 1) lies approximately 1,700 feet to the west and a Southern Pacific Railroad right-of-way runs adjacent to the southern border of the site. West Beach Street is located approximately 600 feet south of the site.

A review of readily available regulatory databases did not reveal active hazardous materials or waste cleanup cases within the proposed project footprint. The State Water Resources Control Board's GeoTracker database identifies 10 sites within 1,000 feet of the project site as former leaking underground storage tank (LUST) cleanup sites, each with a current "Completed – Case Closed" status. These include:

- Phillips Driscopipe, 880 Beach Street W RB Case #492
- Ahlport Petroleum (Venture Oil), 950 Beach Street W. Regional Board Case #339
- Apple Growers Ice, 1000 Beach Street W. Regional Board Case #631
- Big Creek Lumber Co., 1400 Beach Street W. Regional Board Case # 2496
- Little Lake Industries, 1340 Beach Street W. Regional Board Case # 640
- Tom Rosewall & Sons, 1300 Beach Street W. Regional Board Case # 488
- A. L. Lease Company, 1220 Beach Street W. Regional Board Case #602
- Duc Housing Partners, Inc., 425 Errington Road, Regional Board Case #3303
- Statewide Properties, 120 Lee Road. Regional Board #481
- Unocal Bulk Plant #846 Regional Board 3042
- SC Fuels 103 Lee Road. Loc Case #: RO0000352
- Former Chevron Bulk Plant #100, RB Case # 924

The Department of Toxic Substances Control EnviroStor database noted one closed Hazardous Waste - Resource Conservation and Recovery Act site present within 1,000 feet of the site:

- West Coast Circuits, 1080 West Beach Street. Closed in 1994. The site used to manufacture printed circuit boards. One authorized storage unit was clean closed in 1994. Subsequent sampling in 2002 revealed contaminants associated with previous plating operations did not impact soil underneath the plating area. It was determined no further action was needed.

The State Water Resources Control Board GeoTracker database also lists one Informational Item /Review Complete as of 2/4/2023 site with Land Use Restrictions is present within 1,000 feet of the site:

- Monterey Bay Sanctuary Scenic Trail, Segment 18, City of Watsonville Coastal Rail Trail Project (between Walker Street and Lee Road) (T10000020836) Case # RO0000371, and notes the following:
    - Activities prohibited which disturb the remedy and monitoring systems without approval,
    - Day care center prohibited,
    - Elder care center prohibited,
    - Hospital use prohibited,
    - Land use covenant,
    - Maintain monitoring of groundwater,
    - No excavation of contaminated soils without agency review and approval,
    - Notify damages to remedy and monitoring systems upon discovery,
    - Notify prior to subsurface work,
    - Public or private school for persons under 21 prohibited,
    - Requires surface covers, and
    - Residence use prohibited

One active (Open – Site Assessment) site is present within 1,000 feet of the site:

- Sturdy Oil Card Lock, 1110 West Beach Street. Case # RO0000354. A release of diesel to soil was noted in 2015 and a corrective action work plan for soil excavation and soil and groundwater characterization was prepared and approved by the Santa Cruz County

Environmental Health. Santa Cruz County Environmental Health issued a letter dated August 16, 2019 recommended the site be considered for case closure pending four subsequent quarters of groundwater monitoring to further assess the site for closure. Quarterly monitoring reports were submitted as requested, however no further correspondence is noted in the file.

3.9.2 Regulatory Setting

Federal

United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) was created in 1970 to serve as a single source collection of all federal research, monitoring, standard-setting, and enforcement activities to make sure there is appropriate protection of the environment. The EPA's duty is to create and enforce regulations that protect the natural environment and apply the laws passed by Congress. The EPA is also accountable for establishing national criteria for various environmental programs and enforcing compliance.

Comprehensive Environmental Response, Compensation, and Liability Act

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

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) enacted in 1976 governs the disposal of solid waste and hazardous materials. The Resource Conservation and Recovery Act gives the EPA the power to control the generation, transportation, treatment, storage, and disposal of hazardous substances that cannot be disposed of in ordinary landfills. It also allows for each state to apply their own hazardous waste programs instead of implementing the federal program on the condition that the state's program is just as strict in its requirements. This state program must be permitted by the EPA in order to be used.

State

California Environmental Protection Agency

The California Environmental Protection Agency (Cal/EPA) was established in 1991 and is comprised of: the California Air Resources Board, the State Water Resources Control Board, the Regional Water Quality Control Board, CalRecycle, the Department of Toxic Substances Control, the Office of Environmental Health Hazard Assessment, and the Department of Pesticide Regulation. This integrated group amalgamates all of California's environmental authority agencies into one and has led the state of California in developing and applying numerous progressive environmental policies in America. The primary goal of the Cal/EPA is to restore, protect, and enhance the environment.

Regional Water Quality Control Board

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

Cortese List

The Cortese list was authorized by the state legislature in 1985. A list of several types of hazardous materials is gathered by a few agencies as directed by the statute.

Government Code Section 65962.5. (a) The Department of Toxic Substances Control shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:

1. All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.

2. All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.

3. All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
4. All sites listed pursuant to Section 25356 of the Health and Safety Code.

All sites included in the Abandoned Site Assessment Program. Government Code Section 65962.5. (c) The State Water Resources Control Board shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:

1. All underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code.
2. All solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the Department of Toxic Substances Control pursuant to subdivision (e) of Section 13273 of the Water Code.
3. All cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, that concern the discharge of wastes that are hazardous materials.

The proposed project site is not on the Hazardous Waste and Substances Sites (Cortese) List.[10]

California Department of Toxic Control

The California Department of Toxic Control, a department of the Cal/EPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. The California Department of Toxic Control regulates hazardous waste primarily under the authority of the Federal Resource Conservation and Recovery Act and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Santa Cruz County Environmental Health Division

In 1996 the California Environmental Protection Agency designated the Santa Cruz County Environmental Health Division as the "Certified Unified Program Agency" (CUPA) within the geographic boundaries of the County (including all four Cities). As the CUPA, Environmental Health is responsible for enforcing State statutes and regulations as well as the local ordinance (Chapter 7.100) pertaining to the storage, use and disposal of hazardous materials and hazardous waste.

Watsonville 2005 General Plan

The following policies and implementation measures are included in the 2005 General Plan Public Safety Chapter 12:

> *Policy 12.A Environmental and Public Safety*
>
> *Implementation Measure 12.A.3 Industrial Buffer Zones* – The City shall require new industrial projects to provide a clear zone between industrial structures and adjacent residential land use.
>
> *Implementation Measure 12.A.5 Risk Reduction* – The City shall identify, avoid, and/or minimize natural and human-caused hazards in the development of property and the regulation of land use.
>
> *Policy 12.E Hazardous Materials Control*
>
> *Implementation Measure 12.E.1 Inspections* – The City shall conduct periodic safety inspections of industrial and commercial facilities that use and store hazardous materials and dangerous chemicals.

[10] California Environmental Protection Agency. “Cortese List Data Resources.” Accessed October 20, 2022. https://calepa.ca.gov/sitecleanup/corteselist.

Implementation Measure 12.E.6 Identification of Potentially Hazardous New Businesses – The City shall use the development processing and business license process to identify potential hazardous uses and to require preventative programs including, but not limited to, the development of neighborhood, area evacuation plans, and hazardous material handling and disposal plans.

Policy 12.F Fire Safety Standards

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

Implementation Measure 12.F.2 Cul-de-Sacs – New cul-de-sac streets shall have a minimum 32-foot turning radius.

Policy 12.H Fire Suppression Planning

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

3.9.3 Significance Thresholds

Per the CEQA Guidelines, implementation of the proposed project would have a significant impact related to hazards and hazardous materials if it would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;

e) For development within the project area located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.9.4 Impact Discussion

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The use of hazardous materials would be limited to small quantities of construction fuels and fluids during the short-term construction period. In addition, small quantities of chemicals for landscaping and maintenance would be expected to be used by the future tenant of the building. These materials would be stored and used in accordance with the manufacturer's specifications for proper storage and handling. Compliance with the manufacturer's specifications would reduce the chance of upset conditions to less than significant levels.

The MOBPSP states that "A Special Use Permit is required for any use with the potential to generate significant impacts such as noise, odor, use of hazardous materials, significant water demand, or any use that is difficult to clearly classify as a business park use." The project applicant has applied for a Special Use Permit for warehousing and distribution uses with equal or less than ITE LU 150 – Warehousing trip generation rate. The Special Use Permit does not include authorization for the use of hazardous materials. . The City will add a condition of approval requiring any future use of the proposed building that involves the use (transport, handling, storage, or disposal) of hazardous materials to apply for a Major Revision to the Special Use Permit (WMC §14-12.1000) and conduct additional environmental review.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. As previously stated, the City will impose a condition of approval on the project that will require that any future use of the proposed building that involves the use (transport, handling, storage or disposal) of hazardous materials obtain a Major Revision to the Special Use Permit with additional environmental review.

Small quantities of hazardous materials, including fuels, oils, solvents, paints, and other building materials could be accidentally released into the environment during construction. Waste management and materials pollution control BMPs include designated areas for material delivery and storage, stockpile management, spill prevention and control procedures, solid and hazardous waste management, and contaminated soil, concrete waste, and liquid waste management. The City of Watsonville would require the construction contractor(s) to implement safety measures in accordance with General Industry Safety Orders for Spill and Overflow Control (CCR Title 8, Sections 5163-5167) to protect the project area from contamination due to accidental release of hazardous materials. Compliance with applicable CCR Title 8 regulations and the implementation

of standard construction hazardous materials BMPs would assure that the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving hazardous materials.

Fill Material

A Phase I Environmental Site Assessment (ESA) prepared by ATC in December, 2020 for the area located along the south side of Manabe Ow Road and east of Ohlone Parkway, including the project site, observed the presence of elevated and compacted fill material throughout the site and concluded that based on the observed conditions and the lack of available origin information for all of the fill material, that the fill piles observed represented a recognized environmental condition. The Assessment recommended that soil sampling of the fill material be conducted.

In conjunction with the Phase I ESA, ATC performed soil sampling of the fill materials on the site and presented the results in a letter dated January 14, 2021. A copy of the letter is attached to this Initial Study as Appendix E. The fill soil characterization activities performed by ATC included collecting thirty-two discrete soil samples and thirty-two soil samples composited at a 4:1 ratio. Samples were analyzed for the presence of Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Total Petroleum Hydrocarbons (TPH), PCBs, California Administrative Manual (CAM)-17 metal, asbestos, organochlorine pesticides, organo-phosphorus pesticides, and chlorinated herbicides. The following paragraphs describe the field work, laboratory analysis and results, comparison to applicable screening levels, and recommendations from the ATC evaluation letter.

Field Work

ATC collected soil samples at the property on December 14 and 15, 2020. A total of thirty-two sections were laid out in a grid-like pattern across the property with soil samples collected from each section. ATC collected thirty-two discrete soil samples at the center of each section, then stepped out a radial distance of approximately 50 feet and collected four additional soil samples from the section that were composited at a 4:1 ratio. Samples were collected using hand tools and contained in clean laboratory supplied containers appropriate for the requested analyses. Once retrieved, soil samples were labeled, placed in a cooler with ice, and chilled to approximately 40 ^{C} pending transport to the analytical laboratory. Each location was then loosely backfilled with surrounding soil and spoils. No investigation derived waste (IDW) was generated during the activities.

Laboratory Analysis and Results

The collected soil samples were submitted to Pace Analytical of Mount Juliet, Tennessee, a California state-certified laboratory under standard chain-of-custody protocol. The composited soil samples were analyzed for total petroleum hydrocarbons by Environmental Protection Agency (EPA) Method 8015M, CAM 17 metals by EPA methods 6010B and 7471A, organochlorine pesticides by EPA Method 8081A, organophosphorus pesticides by EPA method 8141A, chlorinated herbicides by EPA Method 8151A, and asbestos by OSHA ID-191. The discrete soil samples were analyzed for gasoline range organics (GRO) by EPA Method 8015M, semi-volatile organic compounds (SVOCs) by EPA method 8270, and volatile organic compounds (VOCs) by EPA Method 8260.

A summary of the reported laboratory analytical results of the thirty-two composited and discrete soil samples collected during the investigation is presented below.

Organochlorine Pesticides

- Chlordane was detected above the reporting limits in two of the composited soil samples at concentrations of 0.347 milligrams/kilogram (mg/kg) and 0.628 mg/kg.
- Heptachlor was detected above the reporting limits in one composited soil sample at a concentration of 0.0263 mg/kg.
- Heptachlor epoxide was detected above the reporting limits in one of the composited soil samples at a concentration of 0.0258 mg/kg.
- 4,4'-DDD was detected above the reporting limits in three of the composited soil samples at concentrations ranging from 0.0288 mg/kg to 0.0559 mg/kg.
- 4,4'-DDE was detected above the reporting limits in eleven composited soil samples at concentrations ranging from 0.0437 mg/kg to 0.837 mg/kg.
- 4,4'-DDT was detected above the reporting limits in seven of the composited soil samples in concentrations ranging from 0.035 mg/kg to 0.957 mg/kg.
- Dieldrin was detected above the reporting limits in five of the composited soil samples in concentrations ranging from 0.0059 mg/kg and 0.109 mg/kg.

No other organochlorine pesticides were detected above the respective reporting limits in the composited samples.

Organo-Phosphorous Pesticides

No organo-phosphorus pesticides were detected above the respective reporting limits in the thirty-two composited samples.

Chlorinated Herbicides

No chlorinated herbicides were detected above the respective reporting limits in the thirty-two composited samples.

TPH

- Total petroleum hydrocarbons as gasoline (C5-C12) were not detected above the respective reporting limits in any of the discrete soil samples.
- Hydrocarbons (C12-C22) were detected above the respective reporting limits in fourteen composited soil samples at concentrations ranging from 4.90 mg/kg to 76.60 mg/kg.
- Hydrocarbons (C22-C32) were detected above the respective reporting limits in thirty composited soil samples at concentrations ranging from 5.18 mg/kg to 457 mg/kg.
- Hydrocarbons (C32-C40) were detected above the respective reporting limits in thirty composited soil samples at concentrations ranging from 5.32 mg/kg to 360 mg/kg.

Asbestos

Asbestos was not detected at any percentage in the thirty-two composited samples.

CAM-17 Metals

- Arsenic was detected above the respective reporting limits in all thirty-two composited soil samples at concentrations ranging from 2.56 mg/kg to 15 mg/kg.
- Lead was detected above the respective reporting limits in all thirty-two composited soil samples at concentrations ranging from 3.65 mg/kg to 24 mg/kg.
- Nickel was detected above the respective reporting limits in all thirty-two composited soil samples at concentrations ranging from 9.47 mg/kg to 132 mg/ kg.
- Vanadium was detected above the respective reporting limits in all thirty-two composited soil samples at concentrations ranging from 25.1 mg/kg to 107 mg/ kg.

Other heavy metals were detected above the respective reporting limits in one or more composited soil samples, however concentrations were below screening levels.

VOCs

No VOCs were detected above the respective reporting limits in the thirty-two discrete samples.

SVOCs

- Benzo (a) anthracene was detected above the reporting limit in discrete soil sample 30-D at a concentration of 1.69 mg/kg.
- Benzo (b) flouranthene was detected above the reporting limit in discrete soil sample 30-D at a concentration of 2.37 mg/kg.
- Benzo (a) pyrene was detected above the reporting limit in discrete soil sample 30-D at a concentration of 1.94 mg/kg.
- Dibenzo (a,h) anthracene was detected above the reporting limit in discrete soil sample 30-D at a concentration of 0.24 mg/kg.
- Fluoranthene was detected above the reporting limit in discrete soil samples 26-D and 30-D at concentrations of 0.0469 mg/kg and 4.2 mg/kg, respectively.
- Indeno (1,2,3-cd) pyrene was detected above the reporting limits in discrete soil sample 30-D at a concentration of 1.08 mg/kg.

Other SVOCs were detected above the respective screening levels in discrete soil sample 30-D, however concentrations were below screening levels.

Comparison to Applicable Screening Levels

For the purpose of this investigation, ATC compared laboratory analytical data to the following applicable health-based screening levels.

Health-Based Screening Levels

- San Francisco Bay- Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESL), July 2019 (Rev. 2), Table S-1, Direct Exposure Human Health Risk Levels; Residential and Commercial, Shallow Soil Exposure.

A summary comparison of the laboratory analytical results to the applicable health-based ESLs is provided below:

- Organochloride pesticides – Several of the composited samples with detected organochloride pesticides had concentrations of chlordane, heptachlor epoxide, 4,4'-DDE, 4,4'-DDT, and dieldrin that exceeded the Tier 1 ESL however the concentrations were below the human health based ESL for commercial use. Heptachlor and 4,4'-DDD were reported at concentrations below the Tier 1 ESL in all composited samples.
- Arsenic - All of the composited samples with detected arsenic had concentrations that exceeded both the Tier 1 ESL and the human health based Commercial ESL.
- Nickel – Six out of thirty-two composite samples with detected nickel had concentrations that exceeded the Tier 1 ESL however, the concentrations were below the human health-based ESL for commercial use.
- Vanadium - All of the composited samples with detected vanadium had concentrations that exceeded the Tier 1 ESL however, the concentrations were below the human health-based ESL for commercial use.
- SVOCs – One out of thirty-two of the composited samples with detected SVOCs had concentrations that exceeded the Tier 1 ESL however, the concentrations were below the human health-based ESL for commercial use.

All other constituents analyzed for in the composited and discrete samples were either not detected above the respective laboratory reporting limits or were reported at concentrations below the respective Tier 1 ESL.

Certain constituents, including organochlorine pesticides (chlordane, dieldrin, and DDT/DDE) were detected in a small number of samples at concentrations in excess of the SFBRWQCB Tier 1 ESLs. The presence of these constituents is consistent with historical agricultural land uses that likely occurred at the property or properties that were the source of fill material. Because the Tier 1 ESL values for these constituents are based on protection of ecological receptors, ATC recommended that this soil not be used or placed in sensitive areas such as creeks or sloped areas that drain to creeks and wetlands. It would otherwise be suitable for use as general fill, particularly when placed beneath pavement or flatwork.

Metals were detected in soil at concentrations that are generally consistent with background levels for these naturally-occurring elements. Arsenic, nickel, and vanadium were detected in soil at concentrations in excess of Tier 1 ESL values. However, nickel and vanadium concentrations are below commercial ESLs. Therefore, the presence of these constituents does not represent a threat to human health under a commercial land use scenario. Arsenic occurs naturally in California soils at concentrations in excess of Tier 1 and health-based Commercial ESLs. While a site-specific background concentration of arsenic for the project area has not been established, the SFBRWQCB accepted background concentration for arsenic in Bay Area soil is approximately 11 mg/kg. Three soil samples contained arsenic concentrations slightly higher than this background level, with concentrations ranging from 11.8 mg/kg to 15.0 mg/kg. Given that the average arsenic concentration is approximately 6.1 mg/kg, it is ATC's opinion that the above-referenced samples do not warrant segregation or removal under a commercial land use scenario.

SVOCs were detected in one of the samples at concentrations in excess of Tier 1 ESLs, but below health-based Commercial ESLs. As such, the SVOCs do not represent a potential risk to human health under a commercial land use scenario. It is ATC's opinion that the soil would be suitable for use under such a land use designation.

Based on the sample results, ATC concluded that the soil that was transported to the site as early as 2013 to present and used as fill material emplaced at the property is suitable for reuse at a site classified for industrial/commercial use. However, the soil should not be used for unrestricted purposes such as residential land use. If the soil is transported for offsite disposal it would not be classified as hazardous waste or otherwise regulated material but further testing may be required.

Conclusion

No further action was recommended by ATC with regard to the imported fill soil investigated during this limited soil sampling. Contamination in the imported fill is below commercial screening levels and the results of the samples collected do not warrant the segregation or removal or any further environmental mitigation/monitoring of the imported fill soils for purposes of the development of commercial uses.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or hazardous waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no existing or proposed schools located within 0.25 mile of the project site. The closest school to the project site is Landmark Elementary School, located 0.4 mile north of the project site. Therefore, the proposed project would not create a significant hazard to schools in the vicinity.

d) Be located on a site which is included on a list of hazardous materials 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?

Less than Significant Impact. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (otherwise known as the Cortese List)(CalEPA 2022, DTSC 2022, SWRCB 2022). As a result, it would not create a significant hazard to the public or the environment

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less than Significant Impact. The project is approximately two miles south of the Watsonville Municipal Airport and located within the Airport's Influence Area. It is not located within one of the airport's Safety Compatibility Zones (Watsonville 2013). The height of the proposed facility is consistent with allowable heights in the 2005 General Plan and the Manabe Business Park Specific Plan, as well as similar industrial developments in the area. The project therefore does not pose a safety hazard for people working or residing in the area. Noise associated with operation of the project is primarily traffic related and addressed in Section 3.13 Noise.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Roadways adjacent to the project would be utilized during

construction for the delivery of materials to the construction site. Road and lane closures are not anticipated to be required during construction. However, should the need arise, the contractor, in conjunction with the City's Police and Fire Departments would be responsible for maintaining access for emergency vehicles for the duration of construction and therefore would not significantly impair or physically interfere with an adopted emergency evacuation plan. Fire access plans have been reviewed and approved by local authorities. After project construction is completed, there would be no impediment to vehicular or emergency vehicle access. Thus, the proposed project would have a less-than-significant impact to emergency plans.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The project site is not located in a Very High Fire, High Fire, or Moderate Fire Hazard Severity Zone (Watsonville 2020). The nearest Very High Fire Hazard Severity Zones are located more than six miles to the south and east of the project site (CAL FIRE 2022).

3.9.5 References

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State Water Resources Control Board (SWRCB). 2022. GeoTracker Database. Accessed March 8, 2023 at https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=.

3.10 HYDROLOGY AND WATER QUALITY

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

3.10.1 Environmental Setting

The project site is a vacant parcel adjacent to Manabe Ow Road with Watsonville Slough to the north, a vacant disturbed parcel to the west, Ohlone Parkway to the east, and railroad tracks and other industrial/commercial development to the south. The project site generally slopes from the center of the site to the west, north, and east. Site elevations range from 27.5 feet in elevation near the middle of the site to 20-23 feet to the northern and western perimeters and 17 to 19 feet on the southern and eastern perimeters of the parcel.

Groundwater

As described in the geotechnical report prepared for the project site, groundwater was encountered at depths ranging from 10 feet to 27 feet below site grades at the time of the explorations. Groundwater data for sites surrounding the site indicated much shallower depths to groundwater (between 1.75 and six feet). Groundwater levels can fluctuate due to many factors including but not limited to seasonal fluctuation, underground drainage patterns, and regional factors. Based on this information, the report recommended a design groundwater depth of three feet beneath the existing fills at the site.

Water Quality

Surface water quality is affected by point source and non-point source (NPS) pollutants. Point source pollutants are emitted at a specific point, such as a pipe, while NPS pollutants are generated by surface runoff from diffuse sources such as streets, paved areas, and landscape areas. Point source pollutants are mainly controlled with pollutant discharge regulations established by the RWQCB through NPDES, or waste discharge requirements (see Regulatory section, below).

NPS pollutants are more difficult to monitor and control and are important contributors to reductions in surface water quality in urban areas. Typical stormwater runoff pollutants include oil, grease, and metals accumulated in streets, driveways, parking lots, and rooftops, as well as pesticides, herbicides, particulate matter, nutrients, animal waste, and other substances from landscaped areas. In general, pollutant concentrations in stormwater runoff do not vary significantly within an urbanized watershed. However, pollutant concentrations do increase when impervious cover is more than 40 to 50 percent of the drainage area. Runoff volume is the most important variable in predicting pollutant loads. Surface runoff from the project site and surrounding area drains to Watsonville Slough along the north side of the project site.

Flooding

The project site is located within the limits of Zone AE, as mapped on the FEMA Flood Insurance Rate Map of the area (see FEMA discussion, below). Zone AE is described as a special flood hazard area subject to inundation by the 100-year flood. The mapping shows a base flood elevation of 23 feet (NAVD88) to the west and 24 feet (NAVD88) just beyond the east boundary of the site.

3.10.2 Regulatory Setting

Federal Regulations

Clean Water Act

Under the Clean Water Act (CWA) of 1977, the United States Environmental Protection Agency (USEPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the USEPA to implement water quality regulations. The NPDES permit program under Section 402(p) of the CWA controls water pollution by regulating stormwater discharges into the waters of the United States (US). California has an

approved state NPDES program. The USEPA has delegated authority for water permitting to the State Water Resources Control Board (SWRCB), which has divided the state into nine regional basins, each under the jurisdiction of a RWQCB.

Section 401 requires an applicant for any Federal permit that proposes an activity that may result in a discharge to "waters of the U.S." to obtain certification from the State that the discharge will comply with other provisions of the CWA. In California, a Water Quality Certification is provided by the State Water Resources Control Board and/or RWQCB.

Section 404 authorizes the USACE to regulate the discharge of dredged or fill material to waters of the U. S., including wetlands. The USACE issues individual site-specific or general (Nationwide) permits for such discharges.

Federal Emergency Management Agency (FEMA)

FEMA administers the National Flood Insurance Program (NFIP), which provides subsidized flood insurance to communities that comply with FEMA regulations. The NFIP includes limits on development in flood plains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA, with the minimum level of flood protection for new development set as the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

National Pollutant Discharge Elimination System

As previously discussed, the NPDES permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the U.S. from their municipal separate storm sewer systems (MS4s). Under the NPDES Program, all facilities which discharge pollutants from any point source into waters of the U.S. are required to obtain an NPDES permit. Point source discharges include discharges from publicly owned treatment works (POTWs), discharges from industrial facilities, and discharges associated with urban runoff, such as stormwater. The NPDES permit programs in California are administered by the SWRCB and the nine RWQCBs.

In 1990, the U.S. Environmental Protection Agency (U.S. EPA) promulgated regulations for permitting stormwater discharges from MS4s serving a population of 100,000 people or more. These regulations, known as the Phase I regulations, require operators of medium and large MS4s to obtain NPDES stormwater permits. On December 8, 1999, U.S. EPA promulgated regulations, known as Phase II regulations, requiring permits for stormwater discharges from Small MS4s. On February 5, 2013, the proposed final draft of the Phase II Small MS4 General Permit was adopted and became effective on July 1, 2013. The City of Watsonville and Santa Cruz County are regulated under the Phase II Small MS4 General Permit. (SWRCB 2022)

State Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act (Water Code Sections 1300 et seq.) is the basic water quality control law in California. The Act established the SWRCB, (see also below) and divided the state into nine regional basins, each under the jurisdiction of a RWQCB. The Act authorizes

the SWRCB and RWQCBs to issue and enforce Waste Discharge Requirements, NPDES permits, Section 401 water quality certifications, or other approvals.

State Water Resources Control Board

The SWRCB is the primary State agency responsible for the protection of the state's water quality and groundwater supplies. Construction activities that disturb one or more acres of land must comply with the requirements of the Construction General Permit. Under the terms of the permit, applicants must file permit registration documents with the SWRCB prior to the start of construction. The registration documents include a Notice of Intent (NOI), risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement.

Central Coast Regional Water Quality Control Board

The Central Coast RWQCB is the regional authority responsible for planning, permitting and enforcement of the CWA in Watsonville. The Central Coast RWQCB addresses region-wide water quality issues through the Water Quality Control Plan for the Central Coastal Basin (Basin Plan). The Basin Pan is the Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives.

California Fish and Game Code

The California Department of Fish and Wildlife (CDFW) protects streams, water bodies, and riparian corridors through the streambed alteration agreement process under Section 1600 to 1616 of the California Fish and Game Code. The California Fish and Game Code establishes that "an entity may not divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river stream, or lake (Fish and Game Code Section 1602(a)) without notifying the CDFW, incorporating necessary mitigation and obtaining a streambed alteration agreement. The CDFW's jurisdiction extends from the top of banks and often includes the outer edge of riparian vegetation canopy cover.

Emergency Services Act

The Emergency Services Act, under California Government Code Section 8589.5(b), calls for public safety agencies whose jurisdiction contains populated areas below dams, to adopt emergency procedures for the evacuation and control of these areas in the event of a partial or total failure of the dam. The Governor's Office of Emergency Services (OES) is responsible for the coordination of overall state agency response to major disasters and assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts. In addition, the Cal OES Dam Safety Program provides assistance and guidance to local jurisdictions on emergency planning for dam failure events and is also the designated repository of dam failure inundation maps.

Local Regulations

Pajaro Valley Water Management Agency (PVWMA)

PVWMA is a state-chartered special purpose district formed under State Law pursuant to the Pajaro Valley Water Management Agency Act. PVWMA was formed to efficiently and economically manage existing and supplemental water supplies in order to prevent further increase in, and to accomplish continuing reduction of, long-term overdraft and to provide and ensure sufficient water supplies for present and anticipated needs within its boundaries. PVWMA has the authority to adopt ordinances for the purpose of conserving local groundwater supplies that all public and private water purveyors within the Agency's boundaries must adhere to. The PVWMA service area is comprised of portions of three counties, which are Santa Cruz, Monterey, and San Benito Counties. The PVWMA is responsible for the preparation and implementation of the Basin Management Plan, the principal document that guides all of the major projects and programs pursued by the PVWMA to achieve groundwater sustainability for the Corralitos – Pajaro Valley Subbasin. The current version of the Basin Management Plan, Groundwater Sustainability Update 2022, was adopted by the PVWMA board of directors in November 2021.

Watsonville 2005 General Plan

The following are relevant policies from the General Plan that are related to hydrology and water quality.

> *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.D.1, Recharge Protection* - The City shall direct urban development away from the groundwater recharge zones and surface water bodies. Projects with potential to jeopardize water quality shall be required to include mitigation measures prior to project approval.
>
> *Implementation Measure 9.D.2, Erosion Control* - The City shall continue to enforce regulations over grading activities and other land use practices that expose bare soil and accelerate soil erosion and sediment.
>
> *Implementation Measure 9.D.5, Wetland Protection* - Where drainage from developments involves discharge into sloughs or wetlands, grease, sediment traps, or other protection measures shall be required. Mitigation monitoring shall be required and enforced by the City to ensure performance as appropriate.
>
> *Policy 12.D, Flood Hazard Reduction* - The City shall pursue the protection of new and existing development from the impacts of flooding up to the 100-year event.
>
> *Implementation Measure 12.D.1 Flood Protection* – The City shall require new development to conform to the Flood Damage Prevention Ordinance and the guidelines of the National Flood Insurance Program.
>
> *Implementation Measure 12.D.2 Storm Water Retention* – The City shall condition new development to provide for onsite retention and percolation of storm water run-off.

Implementation Measure 12.D.3 Storm Drains – New development shall be required to pay for or extend all necessary storm drains to serve the project site.

Implementation Measure 12.D.4 Storm Water Collection – The City shall require street design to include curbs and gutters that collect and direct storm water run-off to drainage facilities.

Implementation Measure 12.D.5 Flood Mitigation – The City shall pursue planning and financial support for the improvement of flood conditions along Corralitos and Salsipuedes Creeks, the Pajaro River, and other areas of the drainage basin impacting Watsonville as recommended by the Santa Cruz County Flood Control and Water Conservation District Zone 7.

City of Watsonville Floodplain Management Ordinance

The City of Watsonville maintains the Watsonville Floodplain Management Ordinance. The purpose of the Ordinance is to minimize public and private losses due to flooding in specific areas of the City through the implementation of various provisions. The Ordinance requires a permit to be issued before any construction or other development begins within a flood hazard area. The Ordinance also sets construction standards for buildings within flood-prone areas, including standards to ensure that buildings are properly anchored, have first floors that are elevated above the base flood elevation, constructed with flood-resistant materials, and have openings that permit the entry and exit of floodwaters underneath the structure.

City of Watsonville Stormwater Post-Construction Standards

The Phase II Small MS4 General Permit requires the City to oversee a variety of activities within the City; including public education about pollution prevention, good housekeeping for municipal projects and implementation of best management practices throughout the City.

In January 2014 the City of Watsonville adopted Post-Construction Stormwater Management Requirements. The primary objective of these requirements is to ensure the reduction of pollutant discharges to the Maximum Extent Practicable and preventing stormwater discharges from causing or contributing to a violation of receiving water quality standards in all applicable development projects that require approvals and/or permits issued by the City.

Pajaro River Watershed Flood Prevention Authority

The Pajaro River Watershed Flood Prevention Authority was established in July 2000 by State Assembly Bill 807 in order to “identify, evaluate, fund, and implement flood prevention and control strategies in the Pajaro River Watershed, on an intergovernmental basis.” The Pajaro River Watershed Flood Prevention Authority acts as a governing body through which each member organization can participate and contribute to finding a method to provide flood protection in the watershed and promote general watershed interests.

3.10.3 Thresholds of Significance

Consistent with CEQA Guidelines Appendix G, the project would have a significant impact on hydrology and water quality if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. Result in substantial erosion or siltation on- or off-site;

   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

   iv. Impede or redirect flood flows;

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.10.4 Impact Discussion

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact.

Construction-Related Water Quality Impacts

Construction activities, such as grading and excavation, have the potential to result in temporary impacts to surface water quality in local waterways. When disturbance to the soil occurs, sediments may be dislodged and discharged to the storm drainage system, carried by surface runoff flows across the site. The proposed project would result in the disturbance of approximately 13.4 acres of soil, and therefore is required to comply with the provisions of the Construction General Permit. In addition to the Construction General Permit (which requires the preparation and implementation of a SWPPP), the project is required to comply with the City's adopted erosion control requirements to provide temporary measures to prevent erosion during construction.

Post-Construction Water Quality Impacts

Development of the project site as proposed would result in the creation of more than 2,500 square feet of impervious surface area, making it subject to the City's Post-Construction Stormwater Management Requirements. These regulations require the incorporation of site design measures, source controls, and runoff treatment controls into the design of new or redevelopment projects in order to minimize pollutant loads and reduce velocities of off-site stormwater discharges to local receiving waters. To comply with these regulations, the project includes two bioretention basins which are appropriately sized to treat expected levels of runoff from the building roof, driveways, walkways and parking lot surfaces. The largest retention basin is located along the northern property line to the east of the main entrance driveway, and a smaller basin in the northwest corner of the parcel and west of the main entrance driveway. There are also five smaller retention basins in and around the parking areas at the north end of the site. (see Figure 11 Conceptual Landscape Plan and Figure 13 Preliminary Grading Plan).

Conformance with the Construction General Permit and City of Watsonville erosion control requirements would reduce construction-related water quality impacts to a less than significant level. In addition, the project's proposed onsite runoff treatment facilities (bioretention basins) are consistent with the City's Post-Construction Stormwater Management Requirements, and would reduce post-construction water quality impacts to a less than significant level.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The project would rely on existing sources of water and the City's existing water delivery system. The proposed project would increase the demand for water in the City (refer to Section 3.19 Utilities and Service Systems); however, this increase would be marginal in relation to projected build out of the City under the General Plan and would not result in the overdraft of any groundwater basins. Native and drought resistant species are planned to minimize operational water use for irrigation, and the project includes the incorporation of bioretention basins which would provide opportunities for infiltration of stormwater into the ground.

According to the geotechnical report, the project is being designed with a groundwater depth of three feet beneath the existing fills. Project construction would not require substantial excavation, since the site is being raised with fill to establish the finished floor elevation above the base flood level. Therefore, ground disturbance at the site would be primarily from minor trenching to establish utility connections and excavation to construct the stormwater basins. For the stormwater basins, excavation would extend through five feet of fill and one foot of native soil. Therefore, it is unlikely that groundwater would be encountered during project construction. If groundwater is encountered during excavation, any necessary construction dewatering would be required to adhere to the applicable provisions of the Construction General Permit, including Attachment J (Dewatering Requirements), as well as to any dewatering provisions included in the SWPPP prepared for the project. If construction dewatering occurs, it would be temporary in nature and would not substantially reduce groundwater supplies or affect groundwater quality in the area.

For the reasons described above, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The project is located on relatively flat terrain, and the project includes a stormwater management plan to address increases in stormwater due to the new impervious surfaces proposed at the site. The majority of the site would be covered in pavement or other impervious surfaces, therefore a significant increase in erosion or siltation due to runoff from the site is not expected. The only pervious areas of the site will be landscaped areas, the detention basins and the public access trail along the southern perimeter of the site adjacent to the railroad. The proposed project would not substantially alter the drainage pattern of the site and surrounding areas. Runoff from the site would be treated in bioretention basins prior to release into the City's drainage system, thereby ensuring the project does not result in a substantial additional source of polluted runoff. Additionally, the project includes an erosion control plan with BMPs that would be implemented throughout the construction phases of the project to prevent off-site erosion or siltation resulting from onsite construction activities. The impact is considered less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. The project would increase the overall imperviousness of the site with the addition of approximately 10.92 acres of impervious surfaces. The bioretention basins were sized to detain water and release pre-development flow rates for the 2- and 10-year storm events in conformance with the design standards for bioretention of the City's Post-Construction Stormwater Management Requirements. Therefore, the proposed project would not substantially increase the rate or amount of surface water runoff in a manner which would result in flooding on- or off-site.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As previously stated, the project includes bioretention basins on-site to reduce pollutant loads as well as runoff rates and volumes before being discharged to the City storm drain system. The proposed operation of a warehouse distribution facility does not include outdoor uses that would provide substantial additional sources of polluted runoff. Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The impact is considered less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The site is within the 100-year FEMA flood plain (FEMA 2022). However, the proposed warehouse distribution facility is designed to have a finished floor elevation of 25.8 feet which is more than two feet above the base flood elevation of 23 feet. The

project would not be expected to impede or redirect flood flows, as the proposed building footprint occupies approximately 30 percent of the total site area.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The terms tsunami or seiche are described as ocean waves or similar waves in large water bodies, usually created by undersea fault movement or by a coastal or submerged landslide. The project site is approximately two miles east of the Pacific Ocean tsunami zone. Therefore, the project is not at risk to release pollutants in the event of a seiche or tsunami since there is no nearby waterbody. Additionally, the project does not propose work, storage areas or other areas that are potential sources for polluted water that could be released in the event of a flood.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As noted above, while the project increases impermeable surfaces over existing conditions, the project includes appropriately sized bioretention areas and permeable pavement in conformance with the City's Post-Construction Stormwater Management Requirements. The impact is considered less than significant.

3.10.5 References

Bowman & Williams. 2022. Storm Water Control Plan and Drainage Report for Ohlone Parkway Industrial, 100 Manabe Ow Road, Portion -18-711-34, Watsonville CA. December 13, 2021. Revised May 23, 2022, Revised August 31.

City of Watsonville. 1994. Watsonville 2005 General Plan. Accessed March 8, 2023.

3.11 LAND USE AND PLANNING

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

3.11.1 Environmental Setting

The project site is located in the southwestern portion of Watsonville. The project site was formerly used for agricultural uses. On December 15, 2015, the City of Watsonville Public Works Department issued Excavation & Grading Permit #EG2015-6 for the placement of up to 145,000 cubic yards (CU) of engineered fill on the West Ohlone parcels (APN: 018-711-5, 25, & 26) including the project parcel at what is now 100 Manabe Ow Road. This work was completed by November 2016. The engineered fill covered the project site almost in its entirety (except the regional drainage ditch along the western property boundary). On March 9, 2021, the City issued On/Off Site Grading Permit #1029 to import, place, and compact an additional 20,000 cubic yards of fill on the project site at 100 Manabe Ow Road for soil surcharging. That fill was placed on the site in November 2021. Since that time, the site has been left vacant.

Prominent features within the viewshed of the site include another vacant parcel and Highway 1 to the west, the existing FedEx facility, residential development and Watsonville Slough to the north, light industrial or warehouse type development to the south, and other undeveloped land that was previously in agriculture to the east. Hotel and light industrial uses are located to the west of Highway 1 from the project site.

3.11.2 Regulatory Setting

Local

Watsonville 2005 General Plan

The Watsonville 2005 General Plan was adopted by the City Council in 1994. The Draft Watsonville Vista 2030 General Plan is the subject of ongoing litigation and has not replaced this document to date. Therefore, the 2005 General Plan currently remains in effect. California state law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which in the planning agency's judgment bears relation to its planning" (Gov. Code § 65300). The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. As a comprehensive, long-range statement of a city's development policies, the general plan sums up the City's philosophy of growth and

preservation, highlights what is important to the community, and prescribes where different kinds of development should go. Required elements include land use, circulation, housing, conservation, open space, noise, and safety (Gov. Code § 65302). In 2021, the safety element was amended by incorporating by reference the 2020 Local Hazard Mitigation Plan. The City's general plan also includes elements on urban design, children and youth, recreation, and public facilities.

The following are relevant policies within the Land Use Element of the General Plan:

> *Policy 4.D.1 Modernization* - The City shall encourage existing industrial plants to maintain high standards for public safety and environmental quality consistent with economic feasibility. These standards include emission reduction, noise reduction, built-in fire protection, water conservation, and the safe use, storage, and disposal of hazardous materials.
>
> *Policy 4.D.2 Design and Open Space* - The City shall require that new industrial development be designed to blend with the natural environment and incorporate adequate open space and landscaping to provide an aesthetically pleasing buffer from residential land use. Additionally, on-site recreational space for employees and resource protection for environmentally sensitive habitats shall be required, where appropriate.

Manabe Ow Business Park Specific Plan

The project site is located within the West Business Park of the Business Park District of the Specific Plan. The development standards of this Specific Plan supersede the zoning requirements as set forth in the Watsonville Municipal Code. The following design standards apply to the project:

- Development within the Business Park (BP) District will share common driveways, parking areas, public space, and landscaping. Driveways extending from public roadways shall be generally spaced at a minimum of 100 feet. On-street parking will be allowed on designated internal public streets as described in Chapter 4 - Circulation Plan.
- Lot sizes shall be a minimum of 20,000 square feet for interior lots, and 26,000 square feet for corner lots. In most cases, buildings shall be set back at least 10 feet from internal public streets (front yard).
- Landscaping shall make up no less than 10 percent of the total parcel area. Parking lots adjoining public streets shall be separated with a minimum 5-foot landscape strip. Buildings fronting public streets shall be separated with a minimum 10-foot landscape strip.
- To minimize the adverse visual impact of large, expansive parking lots, a majority of the parking should be located behind or to the sides of buildings. Additionally, loading docks should also be located at the rear or side of buildings and screened.
- Parking spaces shall be provided for each lot as defined in the Watsonville Municipal Code Section 14.17. Parking lots should include both compact and standard size spaces at 40 percent and 60 percent, respectively, of the total amount. Under building parking is encouraged in the flood zone to maximize parking opportunities.

Other design standards for minimum lot area, dimension, minimum yard setbacks, landscaping, and other requirements are found in Table 3-2 of the Specific Plan.

Design guidelines are also presented for the Business Park District and address the following objectives:

- Maximize the development potential for each project through efficient site design by including the use of shared facilities (on lots smaller than one acre) such as common driveways, parking lots, aisleways, landscape screening, trash enclosures, etc.
- Pay special attention to areas visible to the public by considering views from streets and highways
- Maximize opportunities to relate to sloughs and highway visibility and minimize "backside" exposure where feasible Consider impacts to existing built features such as the industrial development and railway, and Sea View Ranch residential development
- Avoid overly large expanses of parking adjacent to public streets

3.11.3 Thresholds of Significance

The project would result in a significant land use impact if it would:

a) Physically divide an established community; or

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.11.4 Impact Discussion

Would the project:

a) Physically divide an established community?

No Impact. The project site is located within the Manabe-Ow Road Business Park Specific Plan and is adjacent to a vacant parcel of land, also within the Specific Plan Area. The proposed construction of a warehouse distribution facility on the project site, which is consistent with the land uses designated in the Specific Plan and with the existing zoning of the property would not be considered to divide an established community. There is an established residential community located to the north of the site outside of the Specific Plan area, but it is physically separated from the project site by Watsonville Slough.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. The proposed project is within the Manabe-Ow Business Park Specific Plan area. The project is a warehouse distribution facility which is an allowed use. City staff confirms the project conforms to the design standards within the Specific Plan and that it meets the criteria for a business park permitted use. The project's consistency with other plans and policies adopted for the purpose of avoiding or mitigating environmental effects are discussed throughout this Initial Study. This Initial Study incorporates best management practices, conditions of approval, and mitigation measures that would reduce the project's potentially significant impacts to less than significant. Therefore, the proposed warehouse facility would not

cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.11.5 References

City of Watsonville. 1994. Watsonville 2005 General Plan. Accessed March 8, 2023.

City of Watsonville. 2010. Manabe-Ow Business Park Specific Plan. Accessed March 8, 2023.

3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local -general plan, specific plan or other land use plan?	☐	☐	☐	☒

3.12.1 Environmental Setting

According to Santa Cruz County Graphic Information Systems information, the project site is located within mineral class zone MRZ-1, meaning that it is in an area where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. This zone is applied where well developed lines of reasoning, based on economic-geologic principles and adequate data, indicate that the likelihood for occurrence of significant mineral deposits is nil or slight.

3.12.2 Regulatory Setting

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

3.12.3 Thresholds of Significance

The project would have a significant impact to mineral resources if it would:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

3.12.4 Impact Discussion

Would the project:

a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact (Responses a – b). There are no known mineral resources of regional value or local importance on or adjacent to the project site. Therefore, the project would not result in the loss of availability of known mineral resources.

3.12.5 References

County of Santa Cruz. 2022. GIS Mapping Application. Hazards and Geophysical data. Accessed March 8, 2023 at https://gis.santacruzcounty.us/gisweb/

3.13 NOISE

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

The evaluation of the proposed project's potential noise and vibration impacts is based on a Technical Noise Memorandum prepared for the project by Placeworks/Rincon that was peer reviewed by MIG. Refer to Appendix G for the Noise Technical Memorandum and Peer Review.

3.13.1 Environmental Setting

"Sound" is a vibratory disturbance created by a moving or vibrating source and is capable of being detected. For example, airborne sound is the rapid fluctuation of air pressure above and below atmospheric pressure. "Noise" may be defined as unwanted sound that is typically construed as loud, unpleasant, unexpected, or undesired by a specific person or for a specific area. The frequency (pitch), amplitude (intensity or loudness), and duration of noise all contribute to the effect on a listener, or receptor, and whether the receptor perceives the noise as objectionable, disturbing, or annoying.

<u>The Decibel Scale (dB)</u>

The decibel scale (dB) is a unit of measurement that indicates the relative amplitude of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 more intense, and so on. In general, there is a relationship between the subjective noisiness, or loudness of a sound, and its amplitude, or intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness.

Sound Characterization

There are several methods of characterizing sound. The most common method is the "A-weighted sound level," or dBA. This scale gives greater weight to the frequencies of sound to which the human ear is typically most sensitive. Thus, most environmental measurements are reported in dBA, meaning decibels on the A-scale. Human hearing matches the logarithmic A-weighted scale, so that a sound of 60 dBA is perceived as twice as loud as a sound of 50 dBA. In a quiet environment, an increase of three dB is usually perceptible, however, in a complex noise environment such as along a busy street, a noise increase of less than three dB is usually not perceptible, and an increase of five dB is usually perceptible. Normal human speech is in the range from 50 to 65 dBA. Generally, as environmental noise exceeds 50 dBA, it becomes intrusive and above 65 dBA noise becomes excessive. Nighttime activities, including sleep, are more sensitive to noise and are considered affected over a range of 40 to 55 dBA. Table 3.13-1 lists typical outdoor and indoor noise levels in terms of dBA.

Table 3.13-1: Typical Outdoor and Indoor Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	-110-	Rock Band
Jet flyover at 1,000 feet		
	-100-	
Gas lawn mower at 3 feet		
	-90-	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	-80-	Garbage disposal at 3 feet
Noise urban area, daytime		
Gas lawnmower, 100 feet	-70-	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	-60-	
		Large business office
Quiet urban daytime	-50	Dishwasher next room
Quite urban nighttime	-40-	Theater, large conference room (background)
Quiet suburban nighttime		
	-30-	Library
Quite rural nighttime		Bedroom at night
	-20-	
		Broadcast/recording studio
	-10-	

Table 3.13-1: Typical Outdoor and Indoor Noise Levels		
Common Outdoor Activities	**Noise Level (dBA)**	**Common Indoor Activities**
Lowest threshold of human hearing	-0-	Lowest threshold of human hearing
Source: Caltrans 2013		

Sound levels are typically not steady and can vary over a short time period. The equivalent noise level (Leq) is used to represent the average character of the sound over a period of time. The Leq represents the level of steady noise that would have the same acoustical energy as the sum of the time-varying noise measured over a given time period. Leq is useful for evaluating shorter time periods over the course of a day. The most common Leq averaging period is hourly, but Leq can describe any series of noise events over a given time period.

Variable noise levels are values that are exceeded for a portion of the measured time period. Thus, L01 is the level exceeded one percent of the time and L90 is the level exceeded 90 percent of the time. The L90 value usually corresponds to the background sound level at the measurement location.

Noise exposure over the course of an entire day is described by the day/night average sound level, or Ldn, and the community noise equivalent level, or CNEL. Both descriptors represent the 24-hour noise impact on a community. For Ldn, the 24-hour day is divided into a 15-hour daytime period (7:00 AM to 10:00 PM) and a nine-hour nighttime period (10:00 PM to 7:00 AM) and a 10 dB “penalty” is added to measure nighttime noise levels when calculating the 24-hour average noise level. For example, a 45 dBA nighttime sound level would contribute as much to the overall day-night average as a 55 dBA daytime sound level. The CNEL descriptor is similar to Ldn, except that it includes an additional five dBA penalty beyond the 10 dBA for sound events that occur during the evening time period (7:00 PM to 10:00 PM). The artificial penalties imposed during Ldn and CNEL calculations are intended to account for a receptor’s increased sensitivity to sound levels during quieter nighttime periods.

Sound Propagation

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise generating source. Theoretically, the sound level of a point source attenuates, or decreases, by six dB with each doubling of distance from a point source. Sound levels are also affected by certain environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and attenuation by barriers. Outdoor noise is also attenuated by the building envelope so that sound levels inside a residence are from 10 to 20 dB less than outside, depending mainly on whether windows are open for ventilation or not.

When more than one point source contributes to the sound pressure level at a receiver point, the overall sound level is determined by combining the contributions of each source. Decibels, however, are logarithmic units and cannot be directly added or subtracted together. Under the dB scale, a doubling of sound energy corresponds to a three dB increase in noise levels. For

example, if one noise source produces a sound power level of 70 dB, two of the same sources would not produce 140 dB – rather, they would combine to produce 73 dB.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern one-dB changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000–8,000 Hz) range. In typical noisy environments, changes in noise of one to two dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of three dB in typical noisy environments. Further, a five-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness.

Noise Effects

Noise effects on human beings are generally categorized as:

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

Most environmental noise levels produce subjective or interference effects; physiological effects are usually limited to high noise environments such as industrial manufacturing facilities or airports. Such physiological effects occur when the human ear is subjected to extremely high short-term noise levels (i.e., 140 dBA from an explosion) or from a prolonged exposure to high noise environments. For example, to protect workers from noise-induced hearing loss, the U.S. Occupational Safety and Health Administration (OSHA) limits worker noise exposure to 90 dBA as averaged over an 8-hour period (29 CFR 1910.95).

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

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

Groundborne Vibration

Vibration is the movement of particles within a medium or object such as the ground or a building. As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared, in inches per second (in/sec). PPV represents the maximum instantaneous

positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Human response to groundborne vibration is subjective and varies from person to person.

Existing Noise Environment

An Environmental Noise Assessment was prepared for an adjacent project at 200 Manabe Ow Road, which included the results of ambient noise measurements conducted near the project site between Thursday, October 14 and Monday, October 18, 2021 (City of Watsonville, 2022). Specifically, one short-term (ST-1) and one long-term measurement (LT-1) were made adjacent to the residential area generally located north of the Project site. The measurements made on Lighthouse Drive are considered representative of conditions at and in proximity of the project site at 100 Manabe Ow Road, too. The results of the ambient noise monitoring are summarized in Table 3.13-2.

Table 3.13-2: Measured Typical Ambient Noise Levels Near the Project Site

Measurement(A)	**Range of Hourly Ambient Noise Data (Hourly L_{eq}, dBA)(B)**		**Range in CNEL (dBA)**
	Daytime (7 AM to 10 PM)	**Nighttime (10 PM to 7 AM)**	
LT-1 (Lighthouse Drive, approximately 365 feet from Project Boundary)	52 to 64(B)	45 to 55	58 to 61
ST-1 (Lighthouse Drive, approximately 540 feet from Project Boundary)	48 to 60**(B)**	41 to 51	53 to 56**(B)**

Source: City of Watsonville, 2022

(A) Measurements were made 12 feet above grade. Long-term measurements occurred from noon on October 14, 2021 to 11 AM on October 18, 2021.

(B) In addition to hourly average L_{eq} data, maximum measured noise levels (L_{max}) ranged from 70 dBA to 86 dBA during daytime hours.

(C) Data are estimated based on a comparison between short-term measurements at this location and long-term measurements at LT-1.

Sensitive Receptors

Noise sensitive receptors are buildings or areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Hospitals, residential areas, schools, and parks are examples of noise sensitive receptors that could be sensitive to changes in existing environmental noise levels. The noise sensitive receptors in proximity (within 1,000 feet) of the proposed project site include:

- An unpaved pedestrian/bike trail located at closest approximately 200 feet north of the project site, across the Watsonville Slough.
- The residences/residential area adjacent to Lighthouse Drive, approximately 380 feet northwest of the project site (at closest).
- The residential area adjacent to Bree Lane, approximately 360 feet northeast of the project site.

- Seaview Ranch Park located approximately 350 feet north of the project site.

3.13.2 Regulatory Setting

Local Regulations

Watsonville 2005 General Plan

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

> *Goal 12.8 Noise Hazard Control* – Evaluate new and existing land uses in the city for compatibility related to noise effects and require, as appropriate, mitigation where harmful effects can be identified, and measurable improvement will result.
>
> *Policy 12.M Noise* – The City shall utilize land use regulations and enforcement to ensure that noise levels in developed areas are kept at acceptable levels, and that future noise-sensitive land uses are protected from noise that is harmful.

The Public Safety Element also identifies the City's noise compatibility guidelines for different land uses. According to Figure 12-6 of the General Plan, the normally acceptable noise limit for single-family residential land uses is 60 CNEL and the conditionally acceptable noise limit is 75 CNEL. For multi-family residential land uses, the General Plan sets 65 CNEL as the normally acceptable noise limit and 75 CNEL as the conditionally acceptable noise limit. The normally and conditionally acceptable noise limits for an industrial land use is 80 CNEL and 85 CNEL, respectively (City of Watsonville, 2005; Figure 12-6).

Manabe-Ow Business Park Specific Plan

The proposed project is located within the Manabe-Ow Business Park Specific Plan area and subject to the plans and policies contained within the Specific Plan. A Special Use Permit is required for construction of the project.

Section 1.3 of the Plan (Guiding Principles) sets forth buildings and associated improvements should be oriented on the site to minimize noise light and glare, and visual impacts to adjacent residential neighborhoods.

Section 3.2.1 of the Plan (Business Park District Development Standards) specifies that any type of land use within the Plan's North Business Park Overlay District that could potentially create excessive noise (including warehouse/distribution uses) shall be required to submit a noise study demonstrating that exterior noises do not exceed 65 dB (CNEL); however, the proposed Project site is not located within Plan's North Business Park Overlay District.

Section 3.8 of the Plan (Site Plan Components Design Guidelines) specifies that landscaping should be provided in various locations around the perimeter of a project site for screening and noise buffering purposes.

Municipal Code

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

- The use of radios, music instruments, stereos, televisions, or other similar devices that disturb the peace and quiet of neighboring residential inhabitants, including the use of such devices between the hours of 7:00 PM and 7:00 AM that are plainly audible at a distance of 50 feet from the structure in which the device is located (WMC Section 5-8.02(a)).
- Yelling, shouting, hooting, whistling, or singing originating from any residential property or upon any public way at any time so as to annoy or disturb the quiet comfort and repose of nearby persons (WMC Section 5-8.02(c)).

The City has not adopted an ordinance regulating construction noise levels.

3.13.3 Thresholds of Significance

In compliance with Appendix G of the State CEQA Guidelines, the project would result in a significant noise impact if it would:

a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local standards general plan or noise ordinance, or applicable standards of other agencies.

b) Generate excessive groundborne vibration or groundborne noise levels.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would be project expose people residing or working in the project area to excessive noise levels.

3.13.4 Impact Discussion

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Less Than Significant Impact. As described in more detail below, the proposed project would not result in a substantial temporary or permanent increase in noise levels in the vicinity of the project from construction or operational activities. This impact would be less than significant.

In addition, the proposed project would not be exposed to ambient noise levels that are incompatible with the industrial nature of the project.

Construction Noise

As described in Section 3.3, Air Quality, the proposed project involves the construction of an industrial warehouse distribution center on vacant land over an approximately 17-month period. Construction activities would disturb approximately 13.4 acres, and would include site preparation, grading, building construction, paving, and architectural coating work. The proposed project would generate construction noise from the following sources:

- Heavy equipment operations throughout the project area. Some heavy equipment would consist of mobile equipment such as a loader, excavator, etc. that would move around work areas; other equipment would consist of stationary equipment (e.g., air compressors) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources such as back-up alarms. Mobile equipment generally operates at different loads, or power outputs, and produce higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level.
- Vehicle trips, including worker, vendor, and haul truck trips. These trips would occur on the roads that provide access to the project site, primarily Manabe Ow Road, Ohlone Parkway, and West Beach Street.

Table 3.13-3 presents estimated noise levels for the types of equipment that would be used to construct the proposed Project. Potential construction noise levels are presented for worst-case equipment operations at a distance of 50 feet (reference noise level) and at specific distances to sensitive receptors in proximity of the Project's construction work areas (e.g., 350 feet to closest residence).

Table 3.13-3: Project Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (L_{max})[A]	Percent Usage Factor[B]	Predicted Noise Levels (L_{eq}) at Distance[C]					
			50 Feet	100 Feet	250 Feet	350 Feet	675 Feet	750 Feet
Backhoe	80	0.4	76	70	62	59	53	52
Bulldozer	85	0.4	81	75	67	64	58	57
Compressor	80	0.4	76	70	62	59	53	52
Concrete Mixer	85	0.4	81	75	67	64	58	57
Crane	85	0.16	77	71	63	60	54	54
Delivery Truck	85	0.4	81	75	67	64	58	57
Excavator	85	0.4	81	75	67	64	58	57
Front End Loader	80	0.4	76	70	62	59	53	52
Generator	82	0.5	79	73	65	62	56	55

Table 3.13-3: Project Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (L_{max})(A)	Percent Usage Factor(B)	Predicted Noise Levels (L_{eq}) at Distance(C)					
			50 Feet	100 Feet	250 Feet	350 Feet	675 Feet	750 Feet
Grader	85	0.4	81	75	67	64	58	57
Man Lift	85	0.2	78	72	64	61	55	54
Paver	85	0.5	82	76	68	65	59	58
Pneumatic Tools	85	0.5	82	76	68	65	59	58
Roller	85	0.2	78	72	64	61	55	54
Scraper	85	0.4	81	75	67	64	58	57
Tractor	84	0.4	80	74	66	63	57	56
Vacuum Truck	85	0.4	61	55	47	44	38	37
Welder	73	0.4	49	43	35	32	26	25

Sources: Caltrans, 2013 and FHWA, 2010.

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

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

(C) Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans 2013: L_{eq} (hourly) = L_{max} at 50 feet – 20log (D/50) + 10log (UF), where: L_{max} = reference L_{max} from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

The following summarizes the construction noise analysis contained in the Technical Noise Memorandum prepared for the project by Placeworks, which utilize sound levels from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) (see Appendix G). The RCNM utilizes the same reference noise levels and usage factors shown in Table 3.13-3.

The noise produced at each construction stage is determined by combining the L_{eq} contributions from each piece of equipment used at a given time while accounting for the ongoing time variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity being performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and/or shielding/scattering effects), the average noise levels at noise-sensitive receptors could vary considerably because mobile construction equipment would move around the site with different loads and power requirements. The edge of the proposed construction site is approximately 350 feet south of the nearest residences on Bree Lane. Based on a source level of 85 dBA L_{max} at 50 feet, construction noise would attenuate to at least 68 dBA L_{max} at the nearest residences. This would not exceed L_{max} noise levels of 70 dBA L_{max} and higher at residences to the north and northwest.

At times, multiple pieces of construction equipment would be active simultaneously. However, they would not all be located at the edge of the construction site. Noise levels were calculated at spatially averaged distances from the approximate center of the site (i.e., from the acoustical center) to the property line of the nearest receptors. This represents the L_{eq} (energy average) construction-related Project noise levels. A reasonable scenario of multiple heavy-duty equipment that could be used simultaneously would be a bulldozer, scraper, and paver. These three pieces of equipment were entered into the FHWA RCNM model to estimate Project construction noise. The average noise produced during construction is determined by combining the L_{eq} contributions from the three loudest pieces of construction equipment while accounting for the ongoing time variations of noise emissions (the usage factor). At a distance of approximately 675 feet from the center of the construction site to the nearest residences on Bree Lane, average construction noise levels would be 60 dBA L_{eq}. Therefore, Project construction noise could, on average, exceed ambient noise levels at residences to the north and northwest by up to 8 dBA L_{eq}.

If uncontrolled, construction noise could be a nuisance to nearby residences. Therefore, the City would implement the following best management practices (BMPs) for noise:

Construction Noise Control BMPs. To reduce potential construction noise levels from project construction activities, the City shall require the following:

- Construction activities shall not take place between the hours of 7:00 PM and 7:00 AM on weekdays, nor prior to 8:00 AM or after 5:00 PM on Saturday. No work shall occur on Sundays or holidays.
- A sign shall be posted at a conspicuous location near the main entry to the site, prominently displaying these hour restrictions and identifying the phone number of the job superintendent.
- Control Construction Traffic and Site Access. Construction traffic, including soil and debris hauling, shall follow City-designated truck routes and shall avoid routes that contain residential dwelling units to the maximum extent feasible given specific project location and access needs.
- Construction Equipment Selection, Use, and Noise Control Measures. The following measures shall apply to project construction equipment:
- Contractors shall use the smallest size equipment capable of safely completing necessary work activities.
- Construction staging shall occur as far away from residential and other noise-sensitive land uses as possible.
- All stationary noise-generating equipment such as pumps, compressors, and welding machines shall be shielded and located as far from noise-sensitive land uses as practical. Shielding may consist of structures or three- or four-sided enclosures provided the structure/enclosure breaks the line of sight between the equipment and the noise-sensitive land use and provides for proper ventilation and equipment operation.
- Heavy equipment engines shall be equipped with standard noise suppression devices such as mufflers, engine covers, and engine/mechanical isolators, mounts, etc. Equipment shall be maintained in accordance with manufacturer's recommendations during active construction activities.
- Pneumatic tools shall include a noise suppression device on the compressed air exhaust.

- The project shall connect to existing electrical service at the site to avoid the use of stationary power generators (if technically, logistically, and economically feasible and approved by the electric service provider).
- No radios or other amplified sound devices shall be audible beyond the project property line.
- Prepare a Construction Noise Complaint Plan. The Construction Noise Complaint Plan shall:
  a. Identify the name and/or title and contact information (including phone number and email) for a designated project and City representative responsible for addressing construction-related noise issues. The project representative shall be the property owner or construction job superintendent. The City representative shall be the City Engineer or designee.
  b. Include procedures describing how the designated Project representative will receive, respond, and resolve construction noise complaints. At a minimum, upon receipt of a noise complaint, the project representative shall notify the City contact, identify the noise source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint.

On-Site Operational Noise

The following summarizes the on-site noise analysis contained in the Technical Noise Memorandum prepared by Placeworks for the project (see Appendix G). The project would generate on-site noise levels from stationary equipment (e.g., HVAC equipment) truck loading and unloading activities, and on-site vehicle movements.

Stationary Sources: Mechanical Equipment. The heating, ventilation, and air conditioning (HVAC) systems would contribute to the operational noise associated with the proposed project. Typical noise levels of HVAC equipment are assumed to be approximately 72 dBA measured from a distance of three feet (Placeworks 2023). At a distance of approximately 370 feet from the nearest residential receptor to the HVAC equipment, the noise level at such a receptor distance would be approximately 30 dBA. This noise level would not exceed typical ambient nighttime noise levels of 45 dBA L_{eq} at sensitive receptor locations, as shown in Table 3.13-2. The proposed project, therefore, would not generate substantial nighttime noise levels from stationary equipment.

Truck-Loading Docks. The proposed project would generate noise associated with truck-loading operations at the dock bays on the southern façade of the warehouse building. The Transportation Impact Study prepared for the proposed project (Appendix H of this Initial Study) indicates that the project would result in 105 daily truck trips and 53 daily trucks for operations (Placeworks 2023). The nearest residential receptor to the proposed project would be along Bree Lane approximately 625 feet north of the nearest loading dock. Since the docks would be located on the southern façade of the building, a noise reduction of approximately 10 dBA was assumed due to shielding of the building. When accounting for the 5 dBA penalty for evening noise levels and the 10 dBA penalty for nighttime noise levels, the estimated daily CNEL would be 24 dBA CNEL, which would not exceed the existing ambient of 58 dBA CNEL at residences to the north and northwest. Noise levels associated with truck-loading operations would not exceed ambient noise levels at residential land uses north and northwest of the project.

As described above, the proposed project would not generate operational noise levels that exceed City standards or otherwise result in a substantial permanent increase in noise levels. This impact would be less than significant.

Localized Vehicle Movements. The FHWA Highway Noise Prediction Model (FHWA-RD 77-108) was used to estimate auto and truck vehicle movements along Manabe Ow Road accessing the project site. Project trip generation representing the project ADT volume and vehicle mix was obtained from Kimley-Horn and modeled at a distance of approximately 300 feet from residences to the north (Kimley Horn 2023). The project applicant estimates that evening truck trips would equal approximately 5 percent of daily truck trips and that nighttime truck trips would equal approximately 1 percent of daily truck trips. To provide for a conservative assessment, it is assumed that evening truck trips could equal 10 percent of daily truck trips, and that nighttime truck trips could equal 5 percent of daily truck trips. The results of modeling indicate that daily vehicle movements would result in a noise level of up to 45 dBA CNEL at residences to the north, which would not exceed the existing ambient of 58 dBA CNEL at residences to the north and northwest.

Combined Noise Levels. The combination of project vehicle movements, truck loading activity, and mechanical equipment is anticipated to result in noise levels of up to 46 dBA CNEL, which would not exceed the existing ambient of 58 dBA CNEL at residences to the north and northwest.

Off-Site Traffic Noise

The proposed Project would generate traffic that would be distributed onto the local roadway system and potentially increase noise levels along travel routes. Caltrans considers a doubling of total traffic volume to result in a three dBA increase in traffic-related noise levels (Caltrans, 2013a).

The FHWA-RD 77-108 model was also used to model traffic noise levels along roadway study segments. The model uses noise emission factors for automobiles, medium-duty trucks, and heavy-duty trucks, with consideration given to vehicle volume, speed, number of lanes, distance to the receiver, and the acoustical characteristics of the site. Traffic data representing average daily traffic (ADT) volumes and vehicle mix were obtained from Kimley-Horn for existing conditions and with Project implementation (Kimley Horn 2023). Table 1 of the Noise Technical Memorandum summarizes the calculated traffic noise levels and the traffic noise increases along the study segments with implementation of the Project (Placeworks 2023). A project would normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas. As described in Section 3.13.1, most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment.

Based on this, the following thresholds of significance—similar to those recommended by the Federal Aviation Administration—are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increases would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher.
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL.
- 5 dBA in ambient noise environments of less than 60 dBA CNEL.

Table 1 of the Noise Technical Memorandum summarizes the estimated project and cumulative traffic noise increases based on ADT traffic volume provided by Kimley-Horn. As shown in Table 1 of the Noise Technical Memorandum, the maximum increase in traffic noise from the project would be 1.3 dBA CNEL along Ohlone Pkwy from Lighthouse Drive to West Beach Street (Placeworks 2023). This would not exceed the most stringent threshold of 1.5 dBA CNEL.

Other Planning Disclosures – Noise and Land Use Compatibility

The California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal.4th 369 (2015) ruled that CEQA review is focused on a project's impact on the environment "and not the environment's impact on the project." Per this ruling, a Lead Agency is not required to analyze how existing conditions might impact a project's future users or residents; however, a Lead Agency may elect to disclose information relevant to a project even if it not is considered an impact under CEQA.

As shown in Table 3.13-2, the measured ambient noise levels near the project site ranged from 58 CNEL to 61 CNEL. The City's General Plan establishes 80 CNEL as the normally acceptable noise exposure limit for industrial land uses. Therefore, the proposed project would not be exposed to unacceptable exterior noise levels that exceed City General Plan standards.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The potential for groundborne vibration is typically greatest when vibratory or large equipment such as rollers, impact drivers, or bulldozers are in operation in close proximity to occupied buildings. For the proposed project, the largest earthmoving equipment is anticipated to operate primarily during the site preparation, grading, and paving phases. This equipment would operate at least 350 feet from any sensitive, occupied building. At this distance, groundborne vibration from typical construction equipment would not be detectable. This impact would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project site is located approximately two miles south of the Watsonville Municipal Airport. Based on an Aircraft Noise Monitoring Report prepared by WJV Acoustics in 2018, the project site is located outside of the airport's 65 CNEL noise contour zone under both existing (2016) and future (2036) conditions. The proposed project, therefore, would not expose people working at the project site to excessive aircraft noise levels. No impact would occur.

3.13.5 References

California Department of Transportation (Caltrans) 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* Sacramento, California. September 2013.

City of Watsonville, 2005. General Plan. Available at: https://www.cityofwatsonville.org/160/2005-General-Plan.

City of Watsonville, 2010. *Manabe Ow Business Park Specific Plan.* December 2010.

City of Watsonville, 2022. *200 Manabe Ow Road Distribution Facility Project IS/MND*. October 2022.

Kimley Horn 2023. *Transportation Impact Study Manabe Ow Road East Parcel – Warehousing Use*. January 2023.

Placeworks 2023. *Ohlone Parkway West Warehouse Project, Watsonville, CA Noise Technical Memorandum*. March 10, 2023.

U.S. Federal Highway Administration (FHWA) 2010. "Construction Noise Handbook, Chapter 9 Construction Equipment Noise Levels and Ranges: <https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook00.cfm>

WJV Acoustics, August 29, 2018. Aircraft Noise Monitoring Report Watsonville Municipal Airport. https://www.cityofwatsonville.org/DocumentCenter/View/12654/Watsonville-Airport-Noise-Report-8-29-18 (accessed February 4, 2022).

3.14 POPULATION AND HOUSING

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

3.14.1 Environmental Setting

Based on information from the U.S. Census Bureau, the City of Watsonville population was estimated to be approximately 52,067 in 2021 (U.S. Census Bureau 2022). The average number of persons per household in Watsonville in 2021 was 3.63. Approximately 28,514 jobs were provided within the City of Watsonville in 2020, that number is projected to increase to 30,303 jobs by the year 2045 (AMBAG 2022).

3.14.2 Regulatory Setting

Regional

Moving Forward Monterey Bay 2045

The Association of Monterey Bay Area Governments (AMBAG) Metropolitan Transportation Plan/ Sustainable Communities Strategy, Moving Forward Monterey Bay 2045 explores how the region will meet its transportation needs for the period through 2045, considering existing and future land use patterns, and population and job growth. It identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian, aviation, as well as transportation demand management (TDM) measures and transportation systems management (TSM).

3.14.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the project would have a significant impact related to population and housing if it would:

a) Induce substantial population 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); or

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.14.4 Impact Discussion

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. (Responses a – b). The project would construct a warehouse on a vacant parcel located in the Manabe Ow Business Park Specific Plan area which was specifically designated for economic and job-generating uses. The project is consistent with the land use and zoning designations for the site. Therefore, the project would not result in unplanned growth either directly or indirectly. No housing or existing people would be displaced as a result of the project, therefore the project would not result in the need for the construction of replacement housing elsewhere. There would be no impact to population or housing.

3.14.5 References

Association of Monterey Bay Area Governments (AMBAG). 2022. Monterey Bay 2045 Moving Forward. October 2022.

U.S. Census Bureau. 2020. QuickFacts. Watsonville city, California. Accessed March 8, 2023 at https://www.census.gov/quickfacts/watsonvillecitycalifornia

3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

3.15.1 Environmental Setting

Fire Protection

The City of Watsonville is served by the Watsonville Fire Department. The Department includes Fire Suppression, Emergency Medical Services, Fire Training, and Fire Prevention Divisions. The Department provides services related to fire prevention, training and safety, which include public education and inspection services, and standard fire department operations, which include emergency response and development of hazard pre-incident plans. The Department serves the 6.6 square miles of Watsonville and its 54,142 residents. In addition, the Department provides service to unincorporated areas near Watsonville, which increases the service area to approximately 14 square miles and a population of 60,000.

The Watsonville Fire Department currently operates two fire stations, Station 1 and Station 2. Station 1 is staffed with six to seven rotating fire fighters with one engine. Station 2 is staffed with three to four rotating fire fighters and one engine. Both stations have paramedics on call. Fire Station 1 would likely be the first to respond to calls from the project site, as it is located one mile to the east at 115 2nd Street.

Police Protection

Police protection services for the project area are provided by the City of Watsonville Police Department (WPD), located at 215 Union Street, approximately two miles east of the proposed project and roughly six to eight minutes driving time from the site. The WPD employs 70 sworn police officers, 18 full-time professional staff, two part-time professional staff and two interns. The Patrol Division is the largest division within the WPD. Six patrol teams are assigned to three daily shifts.

Schools

The Pajaro Valley Unified School District (PVUSD) provides public education in the City of Watsonville and the surrounding area. PVUSD delivers educational programs to over 19,000 students at 16 elementary schools, six middle schools, and three high schools. Additionally, the PVUSD offers five charter schools, 17 children's centers, a continuation high school, Adult Education School, and two alternative schools. Out of that group, seven of the elementary schools, two of the middle schools and two of the high schools are located in the Watsonville-Freedom area. The balance is located in the Aptos area and rural areas beyond the City Limits, including northern Monterey County.

Parks

The City of Watsonville contains 26 parks totaling 143 acres of parkland. The nearest trail facilities to the project site are the Watsonville Slough trail located along the northern bank of Watsonville Slough in the project area. The trail extends north along Highway 1 near the northwest corner of the project site. East of Ohlone Parkway, the Watsonville Slough trail extends along the north, east and southern banks of the Slough. A future trail is also denoted along the project site's southern property boundary along the railroad corridor on the Watsonville Slough Trails map (Watsonville 2018).

The nearest parks to the project site are Seaview Ranch Park and Las Brisas Park located in the residential neighborhoods north of the project site. Seaview Ranch Park is approximately 300 feet northeast of the project site on Lighthouse Drive and Las Brisas Park is located at the corner of Lighthouse Drive and Nueva Vista Avenue approximately 0.17-mile northeast of the project site.

3.15.2 Regulatory Setting

Local

Watsonville 2005 General Plan

The Watsonville General Plan Public Safety Chapter contains the following fire and police protection policies and implementation measures that would be applicable to the project:

> *Policy 12.F Fire Safety Standards* - The City shall use development approval authority, code enforcement, and periodic inspections to ensure that fire prevention standards are maintained.

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

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

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

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

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

Policy 12.H Fire Suppression Planning - The City shall maintain a level of fire protection for the community that emphasizes an aggressive initial attack to stop fires in early stages as well as to have adequate staff and equipment (including mutual aid) to prevent a conflagration.

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

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

*Policy 12.*I Crime Prevention - The City shall provide sufficient funding, adequate personell levels, and necessary equipment to maintain civil order and prevent crime.

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

a. The provision of adequate lighting for personal security
b. The provision of adequate locking devices for windows and doors.
c. The location of walkways and access points.

Policy 12.L Emergency Preparedness - The City shall be prepared to maintain critical public services during emergency situations.

Implementation Measure 12.L.1 Training – All City departments shall conduct the appropriate level of training activities to ensure preparedness before an emergency situation, continuity of services during an emergency situation, and recovery operations after the event.

Implementation Measure 12.L.2 Critical Facilities – The City shall evaluate the ability to survive and continue to operate during emergency conditions, and identify alternate facilities and operating plans for post-emergency recovery.

Implementation Measure 12.L.3 Planning – The City shall annually update the Emergency Preparedness Plan and Local Hazard Mitigation Plan (LHMP) and coordinate planning efforts with the local community and the Santa Cruz County Office of Emergency Services.

Implementation Measure 12.L.4 Evacuation – The City shall designate evacuation routes for the Planning Area, according to the planning format outlined in the Emergency Preparedness Plan and emergency evacuation route analysis in General Plan Appendix D.

Implementation Measure 12.L.5 Local Hazard Mitigation Plan – The City of Watsonville shall actively pursue the implementation of the recommendations included in the 2020 LHMP and subsequent updates.

The General Plan Public Facilities and Services chapter states that police staffing should be maintained at an officer to population ratio of 1:600 and that the ratio should also include one support staff person for every three officers. In addition, it contains the following goals, policies, and implementation measures:

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

Policy 11. A Facilities Coordination

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

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

Policy 11.B Infrastructure - The City shall identify public infrastructure needs and use the Capital Improvements Program to schedule improvements necessary for achieving long-term land use and community development objectives.

Implementation Measure 11.B.1 Growth Management - Through the use of specific plans in new growth areas, the City shall regulate the timing and location of future urban

development to be consistent with the service capacity and financial capability of current support services and the five-year Capital Improvement Program schedule.

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

Policy 11.J. Public Protection - The City shall continue to provide sufficient funding, trained personnel, and all necessary equipment and facilities to maintain city standards for public safety and response time.

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.

Implementation Measure 11.J.2 Response Time -The Police Department shall strive to maintain a 24-hour emergency response time of four minutes or less to all parts of the city and personnel and equipment necessary to meet this standard.

Municipal Code

The City has also adopted the California Fire Code (Chapter 9 of Title 8 of the municipal code) with modifications for local conditions. Applicable policies from the code include:

8-9.304 - Combustible waste material: Including weeds, grass, vines or other growth capable of being ignited and endangering property, will be removed by the owner or occupant.

8.9-903 - Automatic sprinkler systems: All buildings will be required to have approved automatic sprinkler systems in new buildings and structures.

3.15.3 Thresholds of Significance

The project would have a significant impact with regard to public services and recreation if it would:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

    1. Fire protection;
    2. Police protection;
    3. Schools;
    4. Libraries; or
    5. Parks and Recreation Facilities.

3.15.4 Impact Discussion

Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

Less than Significant Impact. The proposed project is anticipated to marginally increase demand for fire protection services. The Fire Department's goal is to provide a response time of four to six minutes or less from the nearest fire station to all portions of the City. The project site is 1.4 miles from the nearest fire station, with a mapped drive time of four minutes (Google 2023). The City Fire Department review the project and confirmed it would not require any changes or modifications to their service delivery model or staffing, and it will not affect the response times to any part of the City (Pers. Comm Simms 2023). Additionally, the Watsonville Fire Department and Fire Inspector would review the design of project plans prior to the issuance of a building permit to ensure incorporation of adequate fire and life safety features in the project. The project site is within a four minute driving distance from the nearest fire station at 115 2nd Street and therefore meets the targeted response time, consistent with Public Safety Policy 12.H.1. The applicant is required to pay applicable fire impact fees at the time of issuance of the building permits, currently $0.45 per square foot of commercial and industrial uses. Payment of applicable fire impact fees and compliance with the Watsonville Fire Code would ensure that the proposed project does not significantly increase the need for fire protection services and result in the need for the construction of new or physically altered facilities in order to meet the City's response times. Therefore, the proposed project would have a less than significant impact on fire protection services.

ii) Police?

Less than Significant Impact. The proposed project is anticipated to marginally increase demand for law enforcement services. The proposed project would be served by the Watsonville Police Department, which is located at 215 Union Street, and is located less than two miles away and within six minutes driving distance of the project site. The City of Watsonville General Plan requires a police officer to population ratio of one officer to 600 people in order to maintain 2005 General Plan service levels and police response. In addition, one civilian staff is required per three officers. The City of Watsonville population was estimated to be approximately 52,067 in 2021 (U.S. Census Bureau 2022). This population requires 87 officers to maintain the then current levels of service in the 2005 General Plan. Because the project does not increase the population in Watsonville through the provision of housing (population is the basis for establishing the service ratio), the project would not impact the existing service ratio standard set by the General Plan.

Because the proposed project is an industrial facility located within an established industrial park area in the City and not a residential use, it would not be expected to substantially increase demand on police services as would a subdivision or other residential use, and therefore would not be expected to compromise response times, exceed planned staffing levels or equipment, nor

require the construction of additional police facilities in order to meet the City's response times. The project would be subject to the standards and requirements of General Plan Implementation Policies 11.A.3 Development Fees, 11.B.1 Growth Management, 11.B.3 Incremental Costs, 11.J.1 Project Review, and 11.J.2 Response Time. Therefore, the proposed project would have a less than significant impact on law enforcement services.

iii) Schools?

No Impact. The project does not include housing and would not induce population growth; therefore, the project would not increase the demand for school services.

iv) Parks?

Less than Significant Impact. The project may increase the use of local parks and amenities in the area due to additional employees at the site. However, because of the industrial nature of the project (as opposed to residential), the project would not be expected to increase recreational use to the extent that new facilities would be needed. Therefore, the project's impact on parks would be less than significant.

v) Other public facilities?

Less than Significant Impact. The project may increase the use of public facilities in the vicinity. However, given the industrial nature of the project and relatively low number of jobs anticipated to be generated, it is not anticipated that the project would increase the use of public facilities to the extent that new facilities would be needed. Therefore, the project's impact on other public facilities would be less than significant.

3.15.4 References

City of Watsonville. 2005. General Plan Public Safety Element. Accessed March 8, 2023 at https://www.cityofwatsonville.org/DocumentCenter/View/188/12-Public-Safety-PDF.

City of Watsonville. 2020. Watsonville Local Hazard Mitigation Plan. July. Accessed March 8, 2023 at https://www.cityofwatsonville.org/DocumentCenter/View/15463/City-of-Watsonville-Local-Hazard-Mitigation-Plan

City of Watsonville. 2022. Annual Report. Accessed May 2, 2023 at: https://cityofwatsonville.org/DocumentCenter/View/21027/2022-Annual-Report-?bidId=

Google. 2023. Google Maps: Watsonville Fire Department 115 2nd Street, Watsonville, CA 95076 to Slough Rd. W, Watsonville, CA 95076. Accessed May 2, 2023 at https://www.google.com/maps/dir/Watsonville+Fire+Department,+115+2nd+St,+Watsonville,+CA+95076/36.9041714,-121.7748961/@36.9050119,-121.7768361,3083m/am=t/data=!3m2!1e3!4b1!4m9!4m8!1m5!1m1!1s0x808e1b25a6d5a5bb:0x2968615728a01dc7!2m2!1d-121.75714!2d36.9079369!1m0!3e0.

Sims, Tom. 2023.. Personal Communication: Tom Sims, Assistant Fire Chief, City of Watsonville with Christina Lau. Email Re: Proposed Warehouse Project at 100 Manabe Ow Road. May 2.

3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

3.16.1 Environmental Setting

There are 26 parks in the City of Watsonville totaling 143 acres of park land. The nearest trail facilities are the Watsonville Slough trail located along the northern bank of Watsonville Slough in the project area. The trail extends along the slough to its terminus at Lee Road, west of Highway 1, and also branches north from the east side of Highway 1 to extend to Struve Slough. A future trail is also denoted along the project site's southern property boundary along the railroad corridor on the Watsonville Slough Trails map (Watsonville 2018).

The nearest parks are Seaview Ranch Park and Las Brisas Park located in the residential neighborhoods north of the project site. Seaview Ranch Park is approximately 0.15 miles northeast of the project site on Lighthouse Drive and Las Brisas Park is located at the corner of Lighthouse Drive and Nueva Vista Avenue approximately 0.35 northeast of the project site.

3.16.2 Regulatory Setting

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Local

Watsonville 2005 General Plan

The Watsonville General Plan contains the following parks and recreation goal, policy and implementation measures that would be applicable to the project.

> *Goal 8.2, Facilities* - Provide a full range of park and recreation facilities including active recreation areas, passive natural open spaces, and a bicycle/pedestrian trail system. Policy 8.A, Recreation and Parks Planning. The City shall plan for park and recreation needs in coordination with the Pajaro Valley Unified School District, Santa Cruz County, and other groups to meet the demand of the growing population.
>
> *Policy 8.B, Park Acquisition and Development* - The City shall designate sites for future parks and recreation facilities and shall continue to finance, acquire, and develop park facilities consistent with the Watsonville Park standards and in proportion to population growth in Watsonville.
>
> *Implementation Measure 8.A.4, Passive Open Space* - The Recreation and Parks Commission shall use the adopted policies for Environmental Resource Management to protect the passive open space provided by the riparian corridors along Corralitos Creek, Salsipuedes Creek, the Pajaro River, and the wetland areas to Watsonville, Struve, and West Branch Struve Sloughs.
>
> *Implementation Measure 8.B.4, Park In-Lieu Fees* - All residential, commercial, and industrial projects shall be subject to park in-lieu fees established by City Council resolution.

City of Watsonville Parks and Recreation Facilities Master Plan

The September 2009 Parks and Recreation Facilities Master Plan is an overarching plan for the development and implementation of future parks and recreational opportunities. The main goals of the plan are to provide a safe and well-maintained parks and facilities that meet the diverse needs of the growing community, to expand and improve trail connections to parks, open spaces and community destinations, celebrate Watsonville's cultural heritage and encourage community building, and to develop and provide recreational facilities that support the health and wellness of the community.

Watsonville Trails and Bicycle Master Plan for the Watsonville Scenic Trails Network

In November 2012, the City prepared the Watsonville Trails and Bicycle Master Plan for the Watsonville Scenic Trails Network which is a component of the Watsonville Urban Greening Plan. The purpose of the Master Plan was to develop a framework for building an integrated system of trails and bikeways that will link residents to the outdoors. The future network will provide residents pedestrian and bicycle trails that connect to the city's parks, schools, transit facilities, commercial centers, and various public facilities. The future network will also serve transportation and recreation needs and help to encourage personal fitness and an improved quality of life. Building upon past planning efforts and existing facilities, this Master Plan contains detailed trail and bikeway recommendations and guidelines, which together form a comprehensive non-vehicular circulation network.

3.16.3 Thresholds of Significance

The project would have a significant impact on the environment if it would:

a) Result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.16.4 Impact Discussion

Would the project:

a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. The project consists of a warehouse development with a limited number of employees. No new housing is proposed as part of the project, nor is it required to support future operations. Because of the industrial nature of the project (as opposed to residential), the project would not be expected to increase recreational use to the extent that new facilities would be needed. As noted above, the project is subject to in-lieu fees to fund recreational needs and improvements. The impact is considered less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. The project is the construction of a warehouse facility and does not require the construction of recreational facilities or the expansion of existing facilities. As stated above, the project does not include new housing. As such, the project would not have an adverse physical effect on the environment associated with the provision of recreational facilities.

3.16.5 References

City of Watsonville. 2018. Watsonville Slough Trails. Accessed on March 8, 2023 at https://www.cityofwatsonville.org/DocumentCenter/View/2912/Watsonville-Slough-Trails-Map-PDF?bidId=.

3.17 TRANSPORTATION

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

A Transportation Impact Study was prepared for the project by Kimley-Horn, dated January 2023. Prior draft versions of the study were peer reviewed by Hexagon Transportation Consultants, Inc., and the January 2023 final version incorporates revisions made in response to the peer review comments.

The study addresses the project's Vehicle Miles Traveled (VMT) and level of Service (LOS) effects in order to assist the City of Watsonville with planning and the identification of conditions of approval, and to mitigate the project's VMT impacts or improve identified LOS deficiencies, if necessary. The following discussion and analyses are based on the findings and conclusions of the study, and a copy of the study and the peer review comments are included in this Initial Study as Appendix H.

3.17.1 Environmental Setting

The City of Watsonville 2005 General Plan designates roadways within the study area as freeway, major arterial, minor arterial, collector, industrial street, parkway, or local road. Descriptions of the specific roadways included in this study are provided below.

Freeways

Highway 1 - is a north-south freeway spanning from Orange County to Mendocino County. Within the study area, Highway 1 is a four-lane freeway divided with a median. The posted speed limit is 65 miles per hour (mph).

Arterials

Harkins Slough Road - is a four-lane roadway from Green Valley Road to Bayview Drive and a two-lane roadway from Bayview Drive to the Watsonville Slough. It becomes Walker Street from

the Watsonville Slough to Front Street. The roadway provides access to the commercial and residential areas near Highway 1. The posted speed limit is 30 mph.

South Green Valley Road - is a four-lane north-south major arterial between Harkins Slough Road and City Limits. The roadway serves commercial land uses and is divided by a median between Harkins Slough Road and Main Street. The posted speed limit is 45 mph north of Main Street and 30 mph south of Main Street.

Riverside Drive (State Route 129) - is an east-west major arterial providing access to industrial, commercial, and residential uses within the study area. Riverside Drive spans from Lee Road to the west and Highway 101 to the east. Riverside Drive is a four-lane roadway east of the Highway 1 northbound ramp intersection and two-lane roadway west of the Highway 1 southbound ramp intersection. Between Lee Road and Sakata Lane, the posted speed limit of 45 mph. Between Sakata Lane and Blackburn Street, the posted speed limit is 25 mph. Between Blackburn Street and Highway 101, the posted speed limit is 45 mph.

West Beach Street - is an east-west major arterial providing access to industrial and residential uses within the study area. The roadway connects to Palm Beach State Park to the west and Hushbeck Avenue to the east. West Beach Street has four lanes west of Harvest Drive and two lanes east of Harvest Drive. The posted speed limit for West Beach Street from west of Lee Road to Industrial Road is 45 mph. The posted speed limit for Beach Street from Industrial Road to Walker Street is 30 mph. The posted speed limit on East Beach Street from Walker Street to Hushbeck Avenue is 25 mph.

Walker Street - is a two-lane north-south minor arterial spanning from Harkins Slough Road to the Pajaro River. The street provides access to industrial and residential uses within the study area. The posted speed limit of 30 mph.

Collectors

Ohlone Parkway - is a four-lane, north-south minor arterial from Main Street to Harkins Slough Road and a two-lane, north-south minor arterial from Main Street to West Beach Street. Ohlone Parkway provides access to industrial, commercial, and residential land uses. Within the study area, the posted speed limit along is 35 mph.

Local Streets

Loma Vista Drive - is a two-lane east-west local street. Loma Vista Drive connects to Paseo Drive to the west and Paradiso Court to the east. The roadway serves residential land uses. The posted speed limit is 25 mph.

Lighthouse Drive - is a two-lane east-west local street. Lighthouse Drive connects to Paseo Drive to the west and Santa Victoria Avenue to the east. The roadway serves residential land uses. The posted speed limit is 25 mph.

Manabe Ow Road - is a two-lane east-west local street. The roadway serves industrial land uses. There is no posted speed limit; therefore, the speed limit is assumed to be 25 mph.

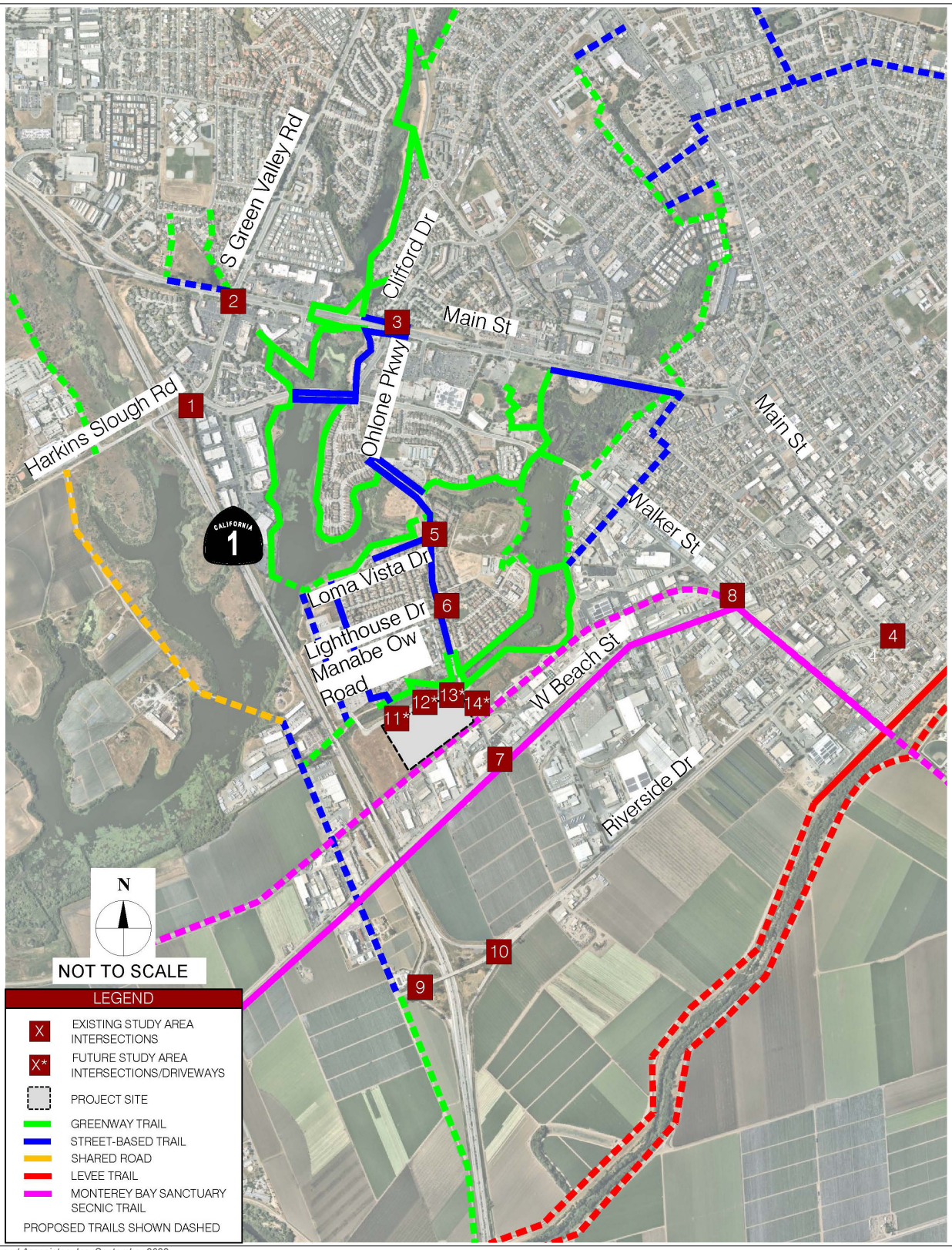
Truck Routes

The following roadway segments are designated truck routes as stated in Section 4-10 of the City's Municipal Code:

- State Route 1 in its entirety.
- State Route 152 in its entirety, which includes:
    - East Lake Avenue from Main Street to the northeastern City limits.
    - East Beach Street from Main Street to Lincoln Street.
    - Lincoln Street between East Beach Street and East Lake Avenue (northbound traffic only).
    - Main Street from State Route 1 to East Beach Street.

- Riverside Drive (State Route 129) in its entirety.
- Main Street from the Pajaro River Bridge to East Beach Street.
- Walker Street from Ford Street to West Front Street.
- West Lake Avenue from Main Street to Walker Street.
- West Beach Street from Walker Street to Main Street.
- West Beach Street east bound from Walker Street to Main Street.
- South Green Valley Road from State Route 1 to Main Street.
- Industrial Road in its entirety.
- Harvest Drive in its entirety.
- Airport Boulevard from Ranport Road to the City limits.
- Lee Road between the northern City limit boundary and the southern City limit boundary.
- Ford Street from Walker Street to Kearney Street.
- Kearney Street from Walker Street to Ford Street.
- Ohlone Parkway (between West Beach Street and Slough Road West), Slough Road West from Ohlone Parkway to its western limit and portion of Business Park Road North that is north of Slough Road West and within Assessor Parcel Numbers 018-711-24 and 018-711-28.

The designated truck routes in relation to the project site are shown on Figure 19.



Source: Kimley-Horn and Associates, Inc. September 2022

Figure 20 Existing and Proposed Trail Facilities

100 Manabe Ow Road Industrial Project

Bicycle and Pedestrian Facilities

There are several existing and proposed bicycle facilities within the study area. Class I bicycle facilities are bike paths/trails having a separate right-of-way and designated for the exclusive use of bicycles and pedestrians with vehicle and pedestrian cross-flow minimized. Class II bicycle facilities are on-street lanes for bicyclists adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Class III bicycle facilities are shared on-street lanes designated by signs or pavement markings for shared use with pedestrians or motor vehicles, but have no separated bike right-of-way or lane striping. Within the project study area, there are Class I, II, and III bicycle facilities along the following corridors:

Class I Bike Paths

- Ohlone Parkway from Harkins Slough Road to Manabe Ow Road
- Pennsylvania Drive from South Green Valley Road and Clifford Avenue
- Main Street from Pennsylvania Drive and Freedom Boulevard

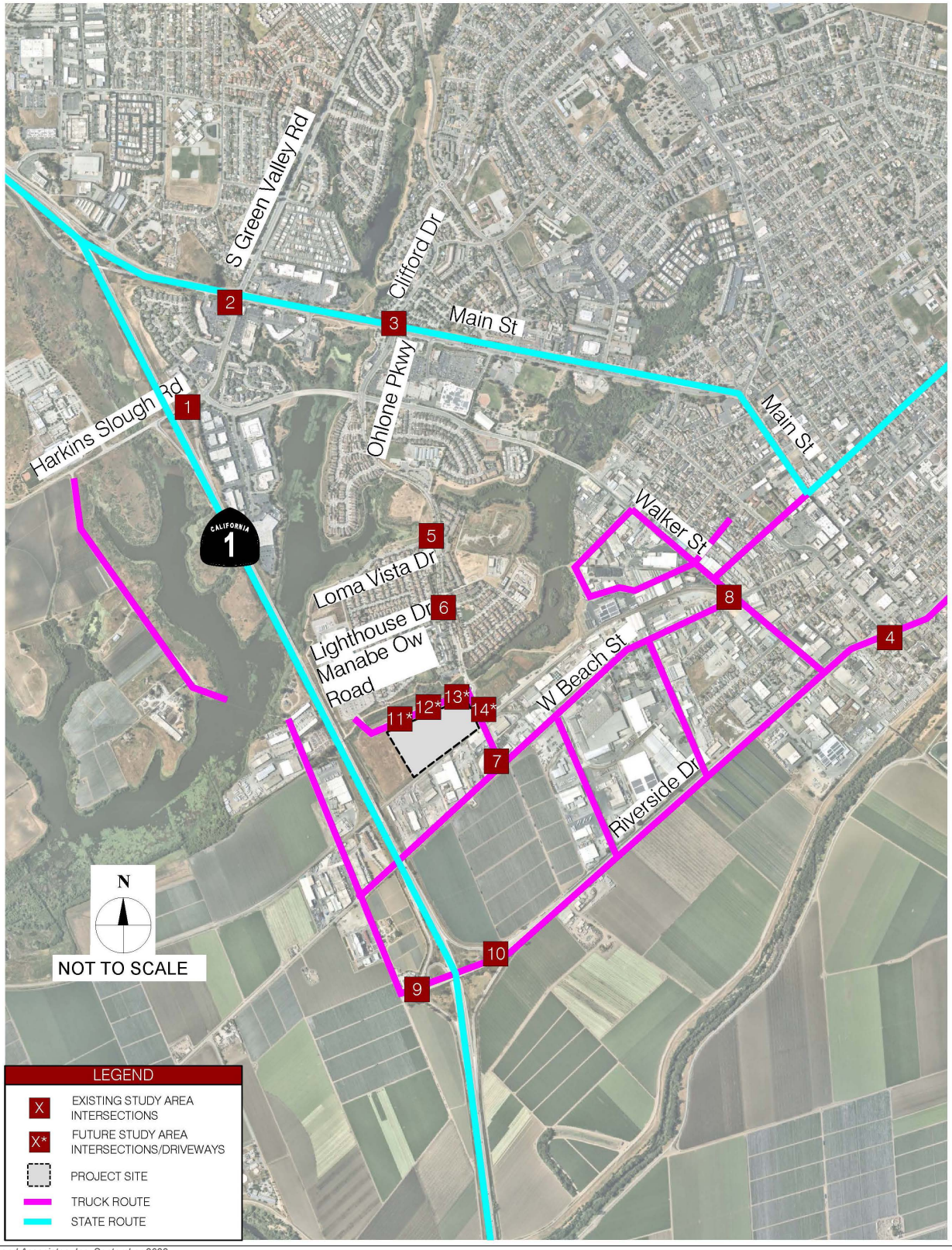
Class II Bike Lanes

- Manabe Ow Road from the Watsonville Slough bridge to Ohlone Parkway
- West Beach Street from Highway 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 Sudden Street
- South Green Valley Road from Harkins Slough Road to Holohan Road
- Airport Boulevard from Highway 1 to Green Valley Road

Class III Bike Routes

- Main Street from Holm Road to Pennsylvania Drive
- West Beach Street from San Andreas Road to Highway 1
- Auto Center Drive from Main Street to Freedom Boulevard
- Freedom Boulevard from Sudden Street to Airport Boulevard
- Riverside Drive from Walker Street to Bronte

In addition to existing facilities, there are future proposed bike facilities in the City's Trails & Bicycle Master Plan on Ohlone Parkway from Manabe Ow Road to West Beach Street and Riverside Drive from Lee Road to Walker Street. Figure 20 illustrates existing and proposed trail facilities in the study area, including the Monterey Bay Sanctuary Scenic Trail Network. Within the city limits, the Monterey Bay Sanctuary Scenic Trail is proposed to run along West Beach Street, the Santa Cruz County Coastal Rail, and Walker Street.



Source: Kimley-Horn and Associates, Inc. September 2022

Figure 19 Truck Routes

100 Manabe Ow Road Industrial Project

Pedestrian Facilities

Pedestrian facilities in the project area consist primarily of sidewalks along streets. There are existing sidewalks along the project frontage on Manabe Ow Road.

Transit Facilities

Santa Cruz Metro provides transit services in the study area, as described below.

Route 69W (Capitola/Cabrillo) - operates between the Santa Cruz Metro Center to the Watsonville Transit Center. Route 69W operates on weekdays between 6:37 AM and 10:35 PM on 60-minute headways and on weekends between 7:50 AM and 7:45 PM on 20- to 30- minute headways. The route runs along Airport Boulevard, Freedom Boulevard, and East Beach Street in Watsonville. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 69A (Capitola/Airport) - operates between the Santa Cruz Metro Center to the Watsonville Transit Center. Route 69A operates on weekdays between 6:20 AM and 7:05 PM on 60-minute headways and on weekends between 7:50 AM and 7:45 PM on 20- to 30- minute headways. The route runs along Main Street and Rodriguez Street in Watsonville. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 71 (Soquel/Freedom) - operates between Santa Cruz Metro Center to the Watsonville Transit Center. Route 71 operates on weekdays between 5:40 AM and 12:45 AM of the next day on 30-minutes headways, and on weekends between 5:58 AM and 12:45 AM of the next day on 40- to 65-minute headways. The route runs along Freedom Boulevard, Main Street, and Clifford Avenue in Watsonville. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 91X (Cabrillo Express) - operates between Santa Cruz Metro Center to the Watsonville Transit Center. On weekdays, Route 91X operates between 5:55 AM and 5:17 PM on 30-to 60-minute headways. There is no weekend service. The route runs along Main Street and Rodriguez Street in Watsonville. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 72 (Green Valley - Hospital) - operates on a loop to and from the Watsonville Transit Center. This route services the Watsonville Community Hospital. The route runs along Main Street, Green Valley Road, Airport Boulevard, Amesti Road, and Pioneer Road. On weekdays, Route 72 operates between 6:45 AM and 6:45 PM on 60-minute headways. There is no weekend service. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 72W (Green Valley- Corralitos) - operates between Browns Valley and Corralitos to the Watsonville Transit Center. There is no weekday service. On weekends, Route 72W operates between 9:25 AM and 6:27 PM on 70-minute headways. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 74S (PVHS/Hospital) - operates on a loop to and from the Watsonville Transit Center. This route services Pajaro High School and the Watsonville Community Hospital. On weekdays, Route 74S operates twice, one loop from 7:00 AM to 8:02 AM and one loop from 3:05 PM to 3:00 PM. The nearest bus stop to the project site is at the intersection of Ohlone Parkway and Bree Lane.

Route 75 (Green Valley - Wheelock) - operates between the Watsonville Transit Center and Wheelock and Monte Vista Schools. On weekdays, Route 75 operates between 5:15 AM and 7:15 PM on 60-minute headways. On weekends, the route operates between 6:05 AM to 6:45 PM on 70-minute headways. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Route 79 (East Lake/Crestview) - operates on a loop to and from the Watsonville Transit Center. This route services Watsonville High School, East Lake Shopping Center, and Crestview Center. On weekdays, Route 79 operates between 7:25 AM and 6:00 PM on 60-minute headways. On weekends, the route operates between 8:30 AM and 5:06 PM. The nearest bus stop to the project site is the Watsonville Transit Center located at the intersection of Rodriguez Street and West Lake Avenue.

Vehicle Miles Traveled (VMT)

With the passage of SB 743, VMT has become an important indicator for determining if a new development will result in a "significant transportation impact" under the California Environmental Quality Act (CEQA). The study prepared by Kimley-Horn summarizes the VMT analysis and resultant findings for the proposed development.

In September 2022, the City of Watsonville adopted VMT analysis guidelines for determining VMT impacts. While the City of Watsonville has a VMT tool that can generally be used to determine the impact of a project, this requires a similar land use to be already constructed in the same TAZ of the project. However, because there are no industrial uses within the project's TAZ, the Santa Cruz County Travel Demand Model (SCCTDM) was used for this analysis.[11] For employment-based uses, the SCCTDM is used as the principal tool to determine VMT while the City of Watsonville's VMT guidelines were used as the basis for the analysis methodology. The SCCTDM's base year was used for this analysis and is representative of 2019 conditions.

Per the City of Watsonville VMT analysis guidelines, the threshold for employment-based VMT uses is set at 15 percent below the regional average. Note that for the purposes of this analysis, the region is defined as Santa Cruz County. Therefore, if the project VMT were to exceed 15 percent below the regional average VMT, this would be considered a significant transportation impact.

[11] The currently existing FedEx warehouse facility located north of the project site was not included in the last update of the travel demand model based on land use data and building permits provided by the City of Watsonville. (Ben Hui, Kimley-Horn. Personal communication, October 3, 2022.)

3.17.2 Regulatory Setting

State

Senate Bill 743

Senate Bill 743 (SB 743) establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions are required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that could indicate whether a development project's VMT may be significant.

Regional and Local

Santa Cruz County Regional Transportation Commission

The Santa Cruz County Regional Transportation Commission (SCCRTC) is the Regional Transportation Planning Agency for Santa Cruz County. Created by the State of California in 1972 to carry out transportation responsibilities that cross city-county boundaries in Santa Cruz County, the SCCRTC sets priorities for major improvements to the transportation infrastructure and network of services, including highways, major roads, bus transit, paratransit, rail and alternative transportation facilities. In addition, the SCCRTC pursues and allocates funding for all elements of the transportation system, adopts policies to improve mobility, access and air quality, plans for future projects and programs to improve the regional transportation system while improving the region's quality of life, informs businesses and the public about the need to better manage the existing transportation system, and conducts programs to encourage the use of alternative transportation modes.

Santa Cruz County Measure D

In November 2016, Santa Cruz County voters approved the Measure D transportation sales tax, which went into effect in April 2017. The ½-cent local sales tax will fund projects and improvements over the next 30 years. The measure is projected to generate $17 million per year and projects include road improvements, bicycle and pedestrian projects, safe routes to school projects, increased transit and paratransit services, and construction and maintenance of the Coastal Rail Trail. These projects are intended to ease congestion and result in reduced greenhouse gas emissions.

Neighborhood Traffic Plan

The City of Watsonville's Neighborhood Traffic Plan was developed to address concerns expressed by residents regarding speeding and other traffic complaints within their neighborhoods. The Neighborhood Traffic Plan seeks to improve neighborhoods by addressing safety and quality-of-life issues by providing residents the opportunity to become actively involved in the improvement of their neighborhoods. Residents are more familiar with traffic concerns

within their neighborhoods, which is why community involvement in this effort is crucial. The Neighborhood Traffic Plan is designed to bring neighborhoods together, provide residents with an understanding of what traffic calming is and to identify appropriate measures, which can alter travel behavior to the betterment of the impacted neighborhoods. The intent is to improve safety and to positively impact resident's quality of life.

Monterey Bay Sanctuary Scenic Trail Network/Rail Trail

The Monterey Bay Sanctuary Scenic Trail Network/Rail Trail is a 50-mile bicycle and pedestrian pathway along Santa Cruz County that runs adjacent to train tracks, coexisting with existing and potential future train service. The pathway provides a non-motorized coastal path for walkers, joggers, cyclists, people with mobility impairments, locals, and visitors and the adjacent rail provides access to 44 schools and 92 parks. The final master plan was adopted in 2013.

Watsonville VMT Policy, Mitigation Banking Program, and In-Lieu Fee to Reduce VMT

The Watsonville City Council adopted a VMT Policy and VMT Banking Fee Program on September 27, 2022, under Resolution No. 205-22. The In-Lieu Fee to Reduce VMT Associated with Development Projects ($1,524.21) was adopted by the City Council on March 14, 2023, under Resolution No. 51-23.

The Watsonville VMT Policy establishes VMT as the appropriate metric for evaluating transportation impacts, establishes VMT thresholds of significance, screening criteria, TDM strategies, and a VMT Mitigation Banking Program. The City of Watsonville VMT Policy establishes a threshold for employment-based VMT uses at 15 percent below the regional average. The Watsonville VMT Mitigation Banking Program is a programmatic approach to respond to the need for feasible VMT mitigation programs. Programmatic approaches that rely on collectively funding larger projects allow a project to obtain an amount of mitigation commensurate with their impact, include only a single payment without the complexity of ongoing management, and do not require on-going mitigation monitoring. Programmatic approaches can also provide a public benefit in terms of funding transportation improvements that would not otherwise be constructed, resulting in improvements to congestion, GHG emissions, increased transportation choices, and additional opportunities for active transportation. The VMT Mitigation Banking Fee Program currently calculates the cost per VMT reduction as $1,524.21.

Watsonville 2005 General Plan

The Watsonville 2005 General Plan was adopted in 1994 and remains in effect. The following policies from the General Plan are applicable to the transportation impacts of the proposed project.

> *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.
>
> *Implementation Measure 10.A.2 Costs of Improvements* – The City shall use the development review process to ensure that new development projects creating a need for additional roadway improvements pay an appropriate share of the costs, based on traffic impact fees and assessment districts.

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.

Implementation Measure 10.C.2 Project Funding – The City shall require as a condition of approval that all development or rezoning which would contribute to a deterioration of existing level of service below level LOS D, provide the necessary improvements, contribute to their provision through the payment of traffic fees, or otherwise mitigate impacts to maintain at least an LOS D. Where existing conditions are already below LOS D, any new development must mitigate traffic conditions to the extent of preventing further deterioration in level of service or, if possible, improving level of service.

Policy 10.G Transit Promotion - In order to encourage use of transit by all age groups and for all purposes, the City shall ensure that transit centers and stops are safe, attractive and do not deter transit use.

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.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.T Landscaping - The City shall encourage the use of vegetation to create or enhance scenic vistas and to serve as buffers for transportation facilities.

Policy 10.U Truck Facilities And Routing - Commodity movement utilizing trucks shall be encouraged and facilitated while related impacts on City streets are minimized to the extent possible.

Policy 10.V Commercial Truck Routes - The City shall take all reasonable actions to prevent heavy truck traffic from using neighborhood collector streets.

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.

3.17.3 Thresholds of Significance

The proposed project would have a significant impact related to transportation if it would:

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b),

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

d) Result in inadequate emergency access.

3.17.4 Impact Discussion

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The proposed project would result in an increase in vehicle trips on the surrounding roadways. However, the project's effect on vehicle delay on nearby roadways would not be considered a significant transportation impact under CEQA, as VMT, not LOS, is the City's adopted standard for assessing transportation impacts. For a discussion of the project's VMT impacts, refer to checklist Impact Question b), below.

The project would not conflict with any General Plan policies related to bicycle, pedestrian or transit facilities. There are existing Class II bike lanes on Manabe Ow Road adjacent to the project site, and a fully developed sidewalk extends along the length of the street across the project frontage and extending to Ohlone Parkway to the east. These facilities are available to serve the project. There are also existing bicycle and pedestrian facilities along Ohlone Parkway, north of the project site. Santa Cruz Metro bus line 74S runs along Ohlone Parkway and would also be available to serve the project site.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less Than Significant with Mitigation Incorporated.

<u>VMT Analysis</u>

As previously mentioned, Kimley-Horn conducted a VMT analysis to determine the proposed project's impacts under CEQA. The Kimley-Horn study states that while the City of Watsonville has a VMT tool that can generally be used to determine the impact of a project, this requires a similar land use to be already constructed in the same Traffic Analysis Zone (TAZ) of the project. However, because there are no industrial uses within the project's TAZ[12], the Santa Cruz County Travel Demand Model (SCC TDM) was used for this analysis. For employment-based uses, the SCC TDM is used as the principal tool to determine VMT while the City of Watsonville's VMT

[12] The currently existing FedEx warehouse facility located north of the project site was not included in the last update of the travel demand model based on land use data and building permits provided by the City of Watsonville. (Ben Hui, Kimley-Horn. Personal communication, October 3, 2022.)

Policy was used as the basis for the analysis methodology. The SCC TDM's base year was used for this analysis and is representative of 2019 conditions.

Per the City of Watsonville VMT Policy, the threshold for employment-based VMT uses is set at 15 percent below the regional average. Therefore, if the project VMT were to exceed 15 percent below the regional average VMT, this would be considered a significant transportation impact. For the purposes of this analysis, the region is defined as Santa Cruz County.

In order to calculate the VMT per Employee produced by the project, only home-based work trips attracted to the project's TAZ were multiplied by each individual trip length to obtain the total home-based work VMT. The external VMT for the non-residential land uses was determined by multiplying the calibrated external trip distance by TAZ, by the total external-internal home-based work trips for that TAZ. The share of industrial employee VMT was then calculated by dividing the trips generated by industrial employees by the total trips generated by employees in the Project's TAZ. Thus, the total industrial home-base work VMT was calculated.

The objective of the VMT analysis is to reduce VMT for commuting to work, returning home or using retail services within the neighborhood by encouraging alternative modes of travel such as walking, bicycling, transit or carpool. VMT analysis is not intended to evaluate how goods and products are shipped and moved in the marketplace. Even though one particular project may generate a significant amount of truck trips, the number of truck trips and resulting VMT for an individual project is incidental when compared to the total VMT generated by residential and office uses. Therefore, the VMT analysis did not account for truck trips.

The results of the VMT analysis showed that the project generated 906 daily VMT. When combined with the number of jobs expected to be produced by the project (60 jobs), the project is estimated to produce 15.1 daily VMT per employee. Based on the regional threshold of 11.8 VMT per employee, the project is expected to exceed the regional threshold by 3.3 VMT per employee. The project therefore exceeds the threshold of significance for VMT/employee and as a result the project would potentially have a significant transportation impact.

TDM Program

To mitigate the effects of the VMT impact, the project has prepared a transportation demand management (TDM) program to reduce the project's VMT. In order to comply with the regional threshold, Project VMT would need to be reduced by 3.3 VMT, which represents a 21.9 percent reduction. In addition, the project would pay into the City's VMT Mitigation Banking Program to further reduce the project's VMT impact to less than significant.

The VMT Mitigation Banking Program recommends TDM measures that would individually reduce the project's VMT and trips, with the goal of obtaining a 21.9 percent VMT reduction. This would result in the Project's potentially significant VMT impact being reduced to a less than significant level. It should be noted, however, that a maximum 15 percent VMT reduction can be achieved by the TDM program per the County's VMT guidelines. Therefore, this TDM program aims to achieve the maximum 15 percent VMT reduction, with the remaining 6.9 percent VMT reduction coming from the VMT Bank Program. For the TDM program, the following TDM measures are being proposed:

1. Travel Behavior Change Program

2. Preferential Carpool Parking Spaces

3. Telecommuting

4. Alternative Work Schedule

5. Bike Share

6. Bicycle Parking in Excess of Code and Showers/Changing Rooms

7. Pedestrian Network Improvements

Based on the proposed TDM measures, the project would be able to achieve the maximum 15 percent VMT reduction allowed per the County's VMT guidelines.

VMT Mitigation Banking Fee Program

The Watsonville VMT Mitigation Banking Fee Program is a programmatic approach to respond to the need for feasible VMT mitigation programs. The Program currently calculates the cost per VMT reduction as $1,524.21. Therefore, to achieve the 6.9 percent VMT reduction needed after implementation of the TDM program, the project would be responsible to pay $91,452.60 based on the current fee structure (VMT Banking Fee = 60 employees x 1.0 VMT per employee x $1,524.21 per VMT). This is calculated as 6.9 percent being equivalent to a 1.0 VMT per employee reduction.

Impact TRN-1: The project could result in a potentially significant VMT impact.

Mitigation Measure TRN-1a. Implementation of a TDM Program. Prior to the commencement of any operations on the project site, the project applicant shall develop and submit, to the satisfaction of the Community Development Director, a TDM Program that includes the following TDM measures to reduce vehicle trips by employees of the project by 15 percent:

1. Travel Behavior Change Program

2. Preferential Carpool Parking Spaces

3. Telecommuting

4. Alternative Work Schedule

5. Bike Share

6. Bicycle Parking in Excess of Code and Showers/Changing Rooms

7. Pedestrian Network Improvements

The project applicant shall submit compliance reports describing the implementation status of each of the seven TDM measures to the Community Development Director on an annual basis for five years following project approval (through 2028). Reports shall be due by the end of March.

Mitigation Measure TRN-1b. Payment Into a VMT Mitigation Banking Program. Prior to the commencement of any operations on the project site, the project applicant shall participate in the Watsonville VMT Mitigation Banking Fee Program by paying the established In-Lieu Fee to Reduce VMT Associated with Development Projects in effect at the time of participation in the Program. The Program currently calculates the cost per VMT reduction as $1,524.21. Therefore, to achieve the 6.9 percent VMT reduction needed after implementation of the TDM program, the project would be responsible for paying $91,452.60 based on the current fee structure (VMT Banking Fee = 60 employees x 1.0 VMT per employee x $1,524.21 per VMT). This is calculated as 6.9 percent being equivalent to a 1.0 VMT per employee reduction.

Conclusion

The proposed project VMT needs to be reduced by 21.9 percent in order to reduce the project's VMT impacts to a less than significant level [project VMT per employee (15.1) minus regional threshold (11.8) = 3.3 VMT per employee over threshold, and VMT per employee over threshold divided by project VMT (3.3/15.1) = 21.9 percent project VMT reduction needed]. Mitigation Measure TRN-1a Implementation of a TDM Program is proposed to reduce project VMT by 15 percent. Mitigation Measure TRN-1b Payment into a VMT Mitigation Banking Program is proposed to provide an additional 6.9 percent reduction in project VMT. The combination of the implementation of the proposed Mitigation Measure TRN-1a Implementation of a TDM Program and Mitigation Measure TRN-1b Payment of the VMT Banking Fee Program fee would result in a 21.9 percent reduction of VMT generated by the project thereby achieving a 15 percent reduction of VMT below the regional average which is the established Threshold of Significance for VMT as stated in the Regulatory Setting. Therefore, the project would result in a less than significant VMT impact.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The project proposes the construction of three unsignalized driveways on Manabe Ow Road and one exit-only driveway on Ohlone Parkway. A sight distance analysis for each of the project's four driveways was conducted by Kimley Horn to determine if vehicles, vans, and trucks exiting each driveway would have adequate sight distance to observe conflicting traffic along the major roadways adjacent to the project site. Intersection sight distance for the project driveways were evaluated following methodology from the American Association of State Highway and Transportation Officials (AASHTO), A Policy on Geometric Design of Highway and Street, 7th Edition3. Sight distance for each project driveway was determined based on the proposed project site plan and the AASHTO intersection sight distance criteria formula. No spot speed study was conducted; posted speed limits and design speeds were used to determine sight distance.

The westernmost driveway on Manabe Ow Road (Driveway 1) is a full access, stop-controlled driveway for northbound movement that provides primarily truck access to the site. The time gap for a single-unit truck to make a left-turn and right-turn onto Manabe Ow Road is 9.5 seconds and 8.5 seconds, respectively. With an assumed 25 mph speed limit along Manabe Ow Road, the sight distance criteria for trucks making a right-turn is 315 feet and making a left-turn is 350 feet. Based on these criteria, it was determined that site distance at Driveway 1 should be clear of

obstructions for a truck exiting the driveway to observe oncoming eastbound and westbound vehicles along Manabe Ow Road.

The middle driveway on Manabe Ow Road (Driveway 2) is a full access, stop-controlled driveway for northbound movement that provides primarily passenger car access to the site. The time gap for a passenger car to make a left-turn and right-turn onto Manabe Ow Road is 7.5 seconds and 6.5 seconds, respectively. With a 25 mph posted speed limit along Manabe Ow Road, the sight distance criteria for passenger cars making a left-turn is 280 feet and making a right-turn is 240 feet. Based on these criteria, it was determined that the sight distance at Driveway 2 should be clear of obstructions for a passenger car exiting the driveway to observe oncoming eastbound and westbound vehicles along Manabe Ow Road.

The easternmost driveway on Manabe Ow Road (Driveway 3) is a full access, stop-controlled driveway for northbound movement that provides access primarily to passenger cars to the site. The time gap for a passenger car to make a left-turn and right turn onto Manabe Ow Road is 7.5 seconds and 6.5 seconds, respectively. With a 25 mph posted speed limit along Manabe Ow Road, the sight distance criteria for passenger cars making a left-turn is 280 feet and making a right-turn is 240 feet. Based on these criteria, it was determined that the sight distance at Driveway 3 should be clear of obstructions for a passenger car exiting the driveway to observe oncoming eastbound and westbound vehicles along Manabe Ow Road.

The driveway on Ohlone Parkway (Driveway 4) is a right-turn only, stop-controlled driveway for eastbound movement that provides access to right-turn outbound trucks and passenger cars. The time gap for a single-unit truck to make a right-turn onto Ohlone parkway is 8.5 seconds. With a 35 mph posted speed limit along Ohlone Parkway, the sight distance criterion for trucks making a right-turn is 440 feet. Based on this criterion, it was determined that the sight distance at Driveway 4 should be clear of obstructions for a truck exiting the driveway to observe oncoming southbound vehicles along Ohlone Parkway.

The sight distance analyses conducted by Kimley Horn for the proposed project driveway intersections concluded that there is adequate sight distance to provide safe entrance to and exit from the site for both trucks and passenger vehicles. The project would therefore not increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.

d) Result in inadequate emergency access?

Less than Significant Impact. The proposed project would not result in operations that would interfere with emergency response access in the project area. During construction of the proposed facility, access may temporarily be restricted on Manabe Ow Road and Ohlone Parkway. However, construction of the project would not prevent emergency vehicles from accessing the project area. The construction contractor would be required to prepare a Traffic Control Plan to manage traffic during construction, including pedestrians and bicyclists, and maintain access to emergency vehicles during construction. The impact is considered less than significant.

3.17.4 Non-CEQA Transportation Related Issues

The Transportation Impact Study included a supplemental traffic operational analysis to determine the effects of the proposed project on the transportation system, including a level of service (LOS)

analysis for use by the City Council in determining General Plan consistency. These issues are not addressed in the CEQA Initial Study checklist, however, they are discussed in the following subsections for informational purposes only and for the purpose of identifying operational deficiencies and recommended improvements needed to ensure the project's non-CEQA related consistency with applicable LOS-based General Plan policies.

Intersection Level of Service

The LOS of an intersection is a qualitative measure used to describe operational conditions. LOS ranges from A (best), which represents minimal delay, to F (worst), which represents heavy delay and a facility that is operating at or near its functional capacity. Levels of service for the Kimley-Horn study were determined using methods defined in the Highway Capacity Manual, 6th Edition (HCM 6) within the Synchro 10 traffic analysis software and described in the table below.

Table 3.17-1: Intersection Level of Service Definitions

Level of Service	***Description***	***Signalized (Ave. Control Delay per Vehicle - sec./veh.)***	***Unsignalized (Ave. Control Delay per Vehicle - sec./veh.)***
A	Free flow with no delays. Users are virtually unaffected by others in the traffic stream.	≤ 10	≤ 10
B	Stable flow but the operation of individual users becomes affected by other vehicles. Modest delays.	> 10 - 20	> 10 - 15
C	Unstable flow with operating conditions at or near the capacity level. Long delays and vehicle queuing.	> 20 - 35	> 15 - 25
D	Forced or breakdown flow that causes reduced capacity. Stop and go traffic conditions. Excessive long delays and vehicle queuing.	> 35 - 55	> 25 - 35
E	Unstable flow with operating conditions at or near the capacity level. Long delays and vehicle queuing.	> 55 - 80	> 35 - 50
F	Forced or breakdown flow that causes reduced capacity. Stop and go traffic conditions. Excessive long delays and vehicle queuing.	> 80	> 50

Sources: Transportation Research Board, Highway Capacity Manual 2016, National Research Council, 2016.

The City of Watsonville does not specify intersection project impact criteria; therefore, impacts were considered project deficiencies if the addition of project traffic causes an intersection to:

- Operate at LOS E or F overall for a signalized or all-way stop-controlled intersection or the worst-case movement for a side-street stop-controlled intersection, or
- Adds five seconds of delay to an intersection already operating at LOS E or F under the comparable No Project scenario.

Existing (2021) Conditions Analysis

The existing conditions analysis performed by Kimley-Horn is based on traffic counts (including a COVID-adjustment factor) as well as existing roadway geometry and traffic controls as of October 2021. The study analyzed a total of 14 intersections in the vicinity of the project site, including the four project driveways (three on Manabe Ow Road, one on Ohlone Parkway), listed below and shown on Figure 19.

1. Harkins Slough Road/NB Hwy 1 off-ramp
2. Main Street/S. Green Valley Road
3. Main Street/Ohlone Parkway
4. Main Street/E. Riverside Drive
5. Ohlone Parkway/Loma Vista Drive
6. Ohlone Parkway/Lighthouse Drive
7. Ohlone Parkway/W. Beach Street
8. Walker Street/W. Beach Street
9. SB Hwy 1 ramps/W. Riverside Drive
10. NB Hwy1 ramps/W. Riverside Drive
11. Manabe Ow Road/Driveway 1
12. Manabe Ow Road/Driveway 2
13. Manabe Ow Road/Driveway 3
14. Ohlone Parkway/Driveway 4

The Kimley-Horn analysis showed that all of the study intersections function within acceptable LOS standards under the Existing (2021) Conditions scenario, except for the following intersections:

#3 – Main Street/Ohlone Parkway (PM peak hour)

#8 – Walker Street/W. Beach Street (PM peak hour)

#10 – NB Highway 1 ramps/W. Riverside Drive (AM and PM peak hours)

Background Conditions Analysis

Background Conditions analysis is based on traffic volumes from approved projects or projects currently under construction and added to existing volumes. The traffic volumes from pending and approved projects were based on the traffic studies, if available. If unavailable, ITE trip generation

and trip distribution from studies with similar land uses were used to estimate traffic volumes. Trip estimates and assignments were completed by Kimley-Horn. The adjacent warehousing distribution center at 200 Manabe Ow Road is one of the pending projects included in this scenario. It was assumed that the signal timings would be optimized due to the ambient volume growth; therefore, some of the signalized intersections show a decrease in delay from the Existing scenario. The intersection LOS analysis results under Background Conditions showed that all study intersections function within acceptable LOS standards under this analysis scenario, except for the following intersections:

#1 – Harkins Slough Road/NB Hwy 1 off-ramp (AM peak hour)

#8 – Walker Street/W. Beach Street (PM peak hour)

#10 – NB Highway 1 ramps/W Riverside Drive (AM and PM peak hours)

Background Plus Project Conditions Analysis

Background Plus Project volumes were determined by adding the total project traffic to the Background Conditions volume. Traffic operations were evaluated at the study intersections under Background conditions plus traffic generated by the project. Intersections operate unacceptably but are not considered a project deficiency if the intersection is operating unacceptably without the project and the increase in delay is less than five seconds. The following intersections operate unacceptably, but are not considered a project deficiency because the project adds fewer than five (5) seconds of delay:

#1 – Harkins Slough Road/NB Hwy 1 off-ramp (AM peak hour)

#8 – Walker Street/W. Beach Street (PM peak hour)

The following intersection operates unacceptably without the project and the increase in delay is more than five (5) seconds. Therefore, it is considered a project deficiency:

#10 – NB Highway 1 ramps/W. Riverside Drive (AM and PM peak hours)

Cumulative (2040) Conditions Analysis

The Cumulative scenario represents the study area in the year 2040. Cumulative (2040) conditions are assumed to be the same as Existing (2021) conditions since no roadway improvements were identified by the City. It was assumed that the signal timings would be optimized due to the ambient volume growth; therefore, some of the signalized intersections show a decrease in delay from the Existing scenario.

To account for future development and growth within the County, the Cumulative (2040) traffic volumes were developed by determining a growth rate from the SCCTDM. Existing and future year model outputs were generated for the roadway links in the study area. These link volumes were then used to determine an annual growth rate that was applied to the Existing (2021) volumes. The volumes were reviewed to ensure that there would be no decrease in volumes from Existing to the Cumulative year. For locations where the volumes would decrease, they were conservatively assumed to equal the Existing volume and rounded up to the nearest 10 vehicles. In addition, the pending adjacent warehousing distribution center project at 200 Manabe Ow Road

was manually added to the Cumulative scenario. The intersection LOS analysis results under Cumulative (2040) Conditions showed that all study intersections function within acceptable LOS standards under this analysis scenario, except for the following intersections:

#1 – Harkins Slough Road/NB Hwy 1 off-ramp (AM peak hour)

#2 – Main Street/S. Green Valley Road (PM peak hour)

#3 – Main Street/Ohlone Parkway (PM peak hour)

#4 – Main Street/E. Riverside Drive (PM peak hour)

#5 – Ohlone Parkway/Loma Vista Drive (AM and PM peak hour)

#6 – Ohlone Parkway/Lighthouse Drive (PM peak hour)

#8 – Walker Street/W. Beach Street (AM and PM peak hours)

#9 – SB Highway 1 ramps/W. Riverside (AM and PM peak hours

#10 – NB Highway 1 ramps/W. Riverside Drive (AM and PM peak hours)

Under the Cumulative (2040) Conditions scenario, Intersections #1 through #6 and #8 through #10 would be below LOS D, which would be inconsistent with General Plan Policy 10.C (Level of Service) that requires that the City maintain a minimum LOS D on all arterial and collector streets. In addition, these intersections dropping below LOS D would trigger Implementation Measure 10.C.2 (Project Funding), which would require, as a condition of approval, that the project provide the necessary improvements, contribute to their provision through the payment of traffic fees, or otherwise mitigate impacts to maintain at least an LOS D at these intersections.

Cumulative (2040) Plus Project Conditions Analysis

Cumulative Plus Project volumes were determined by adding the total project traffic to the Cumulative Conditions volume. Intersections operate unacceptably but are not considered a project deficiency if the intersection is operating unacceptably without the project and the increase in delay is less than five (5) seconds The intersection LOS analysis results under Cumulative (2040) Plus Project Conditions showed that the following intersections operate unacceptably, but each are not considered a project deficiency because the project adds fewer than five (5) seconds of delay:

#1 – Harkins Slough Road/NB Hwy 1 off-ramp (AM peak hour)

#2 – Main Street/S. Green Valley Road (PM peak hour)

#3 – Main Street/Ohlone Parkway (AM and PM peak hours)

#4 – Main Street/E Riverside Drive (PM peak hour)

#5 – Ohlone Parkway/Loma Vista Drive (AM and PM peak hours)

#6 – Ohlone Parkway/Lighthouse Drive (PM peak hour)

#8 – Walker Street/W Beach Street (AM and PM peak hours)

#9 – SB Highway 1 ramps/W Riverside Drive (AM and PM peak hours)

The following intersection operates unacceptably without the project and the increase in delay is more than five (5) seconds. Therefore, it is considered a project deficiency:

#10 – NB Highway 1 ramps/W Riverside Drive (AM and PM peak hours).

Under the Cumulative (2040) Conditions scenario, Intersections #1 through #6, #8 and #9 would be below LOS D, which would be inconsistent with General Plan Policy 10.C (Level of Service) that requires that the City maintain a minimum LOS D on all arterial and collector streets. In addition, these intersections dropping below LOS D would trigger Implementation Measure 10.C.2 (Project Funding), which would require, as a condition of approval, that the project provide the necessary improvements, contribute to their provision through the payment of traffic fees, or otherwise mitigate impacts to maintain at least an LOS D at these intersections.

Intersection Improvements

As described above, the intersections of Ohlone Parkway and Loma Vista Drive (#5) and Ohlone Parkway and Lighthouse Drive (#6) will operate unacceptably under Cumulative and Cumulative Plus Project conditions. The Kimley-Horn report recommended that roundabouts be installed at each of these intersections in order to improve them to acceptable levels of service. Consistent with Implementation Measures 10.A.2 and 10.C.2 of the General Plan, which were also referenced in the Manabe-Ow Business Park Specific Plan Master EIR, the project will be required to construct the roundabout at Ohlone Parkway and Loma Vista Drive with a fair share contribution from the project at 200 Manabe Ow Road.

Vehicle Queuing

Vehicle queuing that exceeds a turn pocket length can create potentially hazardous conditions by blocking or disrupting through traffic in adjacent travel lanes. The effect of vehicle queuing was analyzed by reporting the 95th percentile queues for turning movements where the project would add a significant number of trips to existing or proposed turn pockets. The 95th percentile is defined as the queue length that has only a five percent probability of being exceeded during the analysis time period. The following movements were evaluated:

#3 – Main Street/Ohlone Parkway (AM and PM peak hours)

#4 – Main Street/E Riverside Drive (PM peak hour)

#7 – Ohlone Parkway/W. Beach Street (eastbound left and westbound right)

#10 – NB Hwy 1 ramps/W. Riverside Dive (eastbound left and northbound left)

The queuing analysis showed that all queue lengths are either contained within the available storage or the project does not increase the queue by more than one vehicle length (i.e., 25 feet or more) for queue lengths already exceeding the available storage under No Project conditions. The queuing analysis does not show the need for any left-turn or right-turn storage lanes at the proposed entrances to the project site from the adjacent public streets.

3.17.5 References

Kimley-Horn. Transportation Impact Study – Manabe Ow Road East Parcel –Warehousing Use. January 2023.

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3.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
Cause a substantial adverse change in the significance of a tribal cultural resources, 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:				
i) 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)?	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.	☐	☒	☐	☐

3.18.1 Environmental Setting

A complete history and ethnography of the project site and surrounding area is included in Section 3.5, Cultural Resources.

3.18.2 Regulatory Setting

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) 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.

Native American Heritage Commission, Public Resources Code Sections 5097.9 – 5097.991

Section 5097.91 of the Public Resources Code (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Native American Graves Protection and Repatriation Act of 2001

Codified in the California Health and Safety Code Sections 8010–8030, the California Native American Graves Protection Act (NAGPRA) is consistent with the federal NAGPRA. Intended to "provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect," the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The act also provides a process for non–federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Assembly Bill 52

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests in writing to the lead agency, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. No tribes have requested formal AB 52 consultation with the City.

3.18.3 Thresholds of Significance

Per the CEQA Guidelines, the project would have a significant impact if it would:

a) Cause a substantial adverse change in the significance of a tribal cultural resources, 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;

    i. 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

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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

3.18.4 Impact Discussion

Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resources, 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:

i) 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)?

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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?

a.i) Less Than Significant with Mitigation Incorporated. As detailed in Section 3.5, Cultural Resources, the California Historical Resources Information System (CHRIS) search at the Northwest Information Center (NWIC) showed that there are four known prehistoric archaeological sites within 0.5 miles of the project site. While the boundary of the archaeological site is estimated to be well constrained by Watsonville Slough, and not extend into the project site, that is not a certainty, and resources, including human remains could exist within the project site.

As discussed in Section 3.5, a Sacred Lands File (SLF) search was conducted through the NAHC, which was returned with a positive result on March 24, 2022. In conformance with AB52, the tribes were contacted and requested archaeological sensitivity training for construction contractors, and archaeological and Native American monitoring during construction.

Based on the research detailed in Section 3.5, including the pedestrian survey, historic research, and results of the record searches, buried cultural resources could be present and project excavation could result in the discovery of Tribal Cultural Resources (TCRs) and/or archaeological resources. In the event that project ground-disturbing activities disturb, damage, or destroy previously unknown buried prehistoric features, sites or artifacts, a significant impact could occur. Implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3, described in Section 3.5, would reduce potential impacts to undiscovered TCRs to a less than significant level.

a.ii) Less Than Significant with Mitigation Incorporated. Some Native American artifacts may not be considered unique archaeological resources under the CEQA guidelines (i.e., if there is not a demonstrable public interest in that information, it does not possess a special and particular quality such as being the oldest of its type or the best available example of its type, and it is not directly associated with a scientifically recognized important prehistoric event or person). However, it is possible for a lead agency to determine that an artifact is considered significant to a local tribe, and therefore be considered a significant resource under CEQA. To prevent otherwise non-significant resources which are significant to a local tribe from getting destroyed or damaged, the implementation of Mitigation Measure TRI-1 would reduce impacts to TCRs to less than significant. This mitigation is detailed below.

> **Mitigation Measure TRI-1: Consider all Native American Archaeological Discoveries to be Significant Resources.** All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 until the lead agency has enough evidence to make a determination of significance. The City shall coordinate with an archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications, as well as an appropriate tribe or tribes, as determined by the NAHC, to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.

The implementation of Mitigation Measures CUL-1, CUL-2, CUL-3 and TRI-1 would reduce potential impacts to TCRs to a less than significant level.

3.18.5 References

Lopez, V., 2022. Personal Communication, Amah Mutsun Tribal Band, 3/30/2022, 4/6/2022, 4/9/2022, 4/11/2022. Email and telephone communications. Unpublished record on conversation kept on file by MIG.

Lopez, V., 2022. Personal Communication, Amah Mutsun Tribal Band, 12/16/22. Email communications. Unpublished record kept on file by MIG.

Native American Heritage Commission, 2022. Scared Lands File Search Prepared in Support of the Manabe-Ow Business Park Project, Santa Cruz County. March 24, 2020. Unpublished document kept on file with the NAHC and MIG, Inc.

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Woodrow, Kenneth. 2022. Personal Communications, Wuksache Indian Tribe/Eshom Valley Band, 3/30/22, 7/27/22. Email and telephone communications. Unpublished records kept on file by MIG.

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3.19 UTILITIES AND SERVICE SYSTEMS

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

3.19.1 Environmental Setting

Water Service

According to the Watsonville 2020 Urban Water Management Plan (UWMP), the City owns, operates, and maintains 190 miles of water supply pipelines and, as of 2020, has 65,231 customers including many outside the City limits. The site is currently vacant, therefore, there is no existing water use on site. The site is served by an existing 10-inch and a 6-inch water main at Manabe Ow Road.

Storm Drainage

Since the site is currently undeveloped, there are no existing stormwater drainage facilities on the site. The placement of fill material in recent years has resulted in an elevated area located toward the south-central portion of the site, and stormwater currently sheet flows outward toward the site's boundaries in all directions from this area. The topography slopes most steeply from the

elevated area towards the southerly boundary, and stormwater runoff has been observed to pool in this area following rain events.[13] Manabe Ow Road, adjacent to the site, contains existing City storm drain facilities including curbs, gutters, drop inlets and underground storm drain lines.

Wastewater/Sanitary Sewer Service

Wastewater services are also provided by the City. The City owns, operates, and maintains a sanitary sewer system of approximately 170 miles of pipelines that collect and transfer wastewater to the City's Wastewater Treatment Facility (WWTF). According to the 2020 UWMP, the WWTF is permitted to treat a maximum of 12 million gallons per day. In 2020 the plant treated a total of 1,795 million gallons, or 5,510 acre-feet (AF) from the Watsonville, Pajaro, Freedom, and Salsipuedes Sanitary Districts. The project site is served by an existing 6-inch sewer line that connects to an existing 10-inch sewer main at Manabe Ow Road.

Solid Waste

The City of Watsonville's Municipal Service Center provides a full range of integrated solid waste management services from source reduction to recycling and disposal. The City collects garbage and recyclables from over 11,000 homes and businesses each week. The City's Solid Waste Division maintains the City-owned landfill, however, the landfill (Watsonvillle Landfill) is currently closed, and the City is transporting the refuse to the Monterey Regional Waste Management District's (ReGen Monterey) Monterey Peninsula Landfill in unincorporated Salinas, approximately 12 miles south of the City of Watsonville.[14]

3.19.2 Regulatory Setting

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that

[13] Matt Orbach. Personal communication. March 29, 2023.
[14] Kasey Kolassa, Santa Cruz County Recycling and Solid Waste Manager. Personal communication, October 4, 2022.

would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

3.19.3 Thresholds of Significance

Per the CEQA Guidelines, implementation of the project would have a significant impact related to utilities and service systems if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the projected demand in addition to the provider's existing commitments;

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

e) Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.19.4 Impact Discussion

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. Construction of water supply infrastructure is required for new development, and the project would connect to the existing 10-inch water main in Manabe Ow Road via the existing 6-inch line that stubs at the property line near the proposed northeastern driveway for the project. The project would construct a 2-inch lateral to connect to the 6-inch line. As a standard requirement, prior to issuance of building permits, the developer would be required to provide the City with a detailed study indicating specifications of the new water infrastructure and any minor modifications needed to the existing municipal conveyance system to accommodate project needs. Construction of new water supply infrastructure would be conducted in compliance with the City's Public Improvement Standards and City-approved utilities construction Best Management Practices (BMPs); therefore, project construction would not cause significant environmental impacts.

The City relies primarily on its groundwater sources for 90 to100 percent of its water supply and continuously monitors groundwater well levels. According to the City of Watsonville 2020 Urban Water Management Plan (UWMP), fourteen groundwater wells provided the City with a range of 6,316 to 7,102 acre-feet per year (AFY) of water over the last five years. The City's wells are capable of providing 21,000 AFY of water. The UWMP states that the City intends to continue pumping groundwater from its existing well sources, and that it is likely that additional sources will be explored for future use to replace aging wells and to provide sufficient redundancy. However, at the current time the City's wells are capable of providing for both current and projected water demands through the planning period of 2045. Therefore, no new public water supply facilities would be needed to serve the proposed project, and impacts from the relocation or construction of any new or expanded water facilities would be less than significant.

The project would connect to an existing 10-inch sanitary sewer main in Manabe Ow Road, via two new connection points and 6-inch laterals located on the project frontage. As a standard requirement, prior to issuance of building permits, the applicant would be required to provide the City with a detailed study indicating specifications of the new wastewater infrastructure and any minor modifications needed to the existing municipal conveyance system to accommodate project-generated wastewater.

Anticipated project wastewater generation was calculated using a conservative industry standard in which wastewater generated equals 95 percent of water use (see subsection 3.19.3 b below for projected project water demand). The applicant estimates water use at 766,500 gallons per year.[15] As a result, the project would produce approximately 728,175 gallons of wastewater per year or approximately 1,995 gallons per day.[16] The WWTF has a permitted daily wastewater intake of 12 million gallons per day. The WWTF would have adequate capacity to treat project wastewater in addition to its existing commitments. No new public wastewater conveyance or treatment facilities would be needed to serve the proposed project. Similar to water infrastructure (see above) construction impacts for wastewater infrastructure would be less than significant.

The project site would generate stormwater runoff from impermeable surfaces including parking areas, the building roof, and walkways. The Preliminary Drainage Plan and Preliminary Drainage

[15] Based on California Plumbing Code generation factor of 35 gallons/employee for warehouse uses, including showers.
[16] Based on 95% of estimated water consumption.

Management Area Map prepared for the project (Bowman & Williams 2023) show the majority of the project area draining to two large bioretention basins located in the northwest portion of the site. The combined total bioretention area of two the basins is 39,991 square feet. Runoff from other, smaller impervious surface areas located behind the sidewalk on Manabe Ow Road would drain to existing narrow bioretention facilities located in the park strip. These facilities are within the public street right-of-way, and would also treat runoff from the adjacent sidewalk and a portion of the street. In addition to the proposed on-site bioretention treatment facilities, the project includes the construction of a 9-foot-wide City access road constructed of gravel and an adjacent 2-foot wide gravel- or grass-lined swale that will run the length of the southern project boundary. This swale will convey runoff from the City access road and the proposed landscaping strip along the rear of the southern parking lot westward to a similar swale to be constructed along the planned City access road behind the adjacent 200 Manabe Ow Road property. The connected swales will ultimately discharge the runoff through energy dissipators into the existing regional drainage channel that is located between the 200 Manabe Ow Road property and Highway 1.

The proposed drainage system was designed to covey storm flows up to the 10-year storm event, and the bioretention basins have been designed consistent with the Central Coast Regional Board's design standards for Low Impact Development treatment facilities. These facilities will detain treated water on-site and release pre-development flow rates for the 2-year and 10-year storm events. These design features ensure that project impacts to existing stormwater drainage facilities are less than significant.

Offsite improvements for electric power, or telecommunication facilities outside of the existing Manabe Ow Road right-of-way are not anticipated and off-site improvements, construction, or relocation are also not required for the project. Natural gas will not be used on the project site therefore no connection to the natural gas utility is required. Therefore, the impact is considered less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. As discussed under Question a), the project would use water temporarily for construction and irrigation purposes. Long term water use is conservatively estimated at 766,500 gallons per year. Water demand for the Manabe Ow Business Park Specific Plan was analyzed in the Manabe Ow Specific Plan EIR which found that the conversion of agricultural land to other uses would significantly reduce water demand in the plan area and found the impact to be less than significant. The proposed project is consistent with the Specific Plan land use and zoning designations for the project.

According the UWMP, the City of Watsonville can provide reliable water supplies under normal conditions (Average Year) and for Singe Dry Year and Five Consecutive Dry Year events. Based on a Normal year supply of 21,900 AFY, supply is estimated to exceed demand by 14,073 AFY in the year 2025, by 13,877 AFY in 2030, by 13,676 AFY in 2035, by 13,525 AFY in 2040, and by 13,396 AFY in 2045. For the Single Dry Year scenario, supply would exceed demand by 13,212 AFY in 2025, by 12,994 AFY in 2030, by 12,772 AFY in 2035, by 12,604 AFY in 2040, and by 12,460 AFY in 2045. Similarly, the exceedance would be in excess of 13,000 AFY in each of the years 2025, 2030, 2035 2040 and 2045 under the Multiple Dry Years scenario described in the UWMP. The UWMP also provides an assessment of the impact of a drought on water supplies. The highest projected water use under this assessment, which used a base case of five

consecutive years (2021 – 2025) is 8,799 AFY in 2022. The City's water use in 2013, the Single Dry Year, was 8,318 AFY. Thus, this assessment predicted an increase in water demand of 481 AFY over the Single Dry Year under drought conditions. However, this increase in water demand still resulted in a surplus of 12, 201 AFY. Therefore, the project would have sufficient water supplies available and the impact is considered less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. The Watsonville WWTP is permitted to treat an average dry weather flow of 12.0 million gallons per day (MGD). However, the WWTP currently treats an average dry weather flow of approximately 5.5 MGD from residential, commercial, and industrial uses.[17] The project's proposed generation of 728,175 gallons per year would not adversely impact the facility from meeting the proposed project needs and existing commitments. The impact is considered less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. The project would generate construction debris during the construction period as well as during operation of the facility. Solid waste generated by the project during the construction period and operations would be disposed of in accordance with City requirements. The Monterey Peninsula Landfill, which is currently receiving solid waste from the City of Watsonville has been operating since 1965 and is estimated by its engineers to have space for more than 100 years of waste disposal.[18] The project would therefore not generate solid waste in excess of local infrastructure nor would it impair attainment of solid waste reduction goals.

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

No Impact. The project would not conflict with any federal, state, or local statutes and regulations related to solid waste.

3.19.5 References

City of Watsonville and Carollo Engineers. 2020. City of Watsonville Wastewater Master Plan Study Session presentation. March 10. Accessed March 15, 2023 at https://www.cityofwatsonville.org/DocumentCenter/View/15867/Wastewater-Master-Plan-Council-Study-Session-2020-1.

[17] Ryan Smith, Wastewater Division Manager, City of Watsonville. Personal communication, May 3, 2023.

[18] ReGen Monterey. Monterey Peninsula Landfill. Accessed October 4, 2022 at: https://regenmonterey.org/monterey-peninsula-landfill/

Harris & Associates. 2021. Final City Of Watsonville 2020 Urban Water Management Plan. Prepared for the City of Watsonville.

RBF Consulting. 2010. Draft Master Environmental Impact Report. Manabe-Ow Business Park Specific Plan. SCH# 2008122060. Prepared for the City of Watsonville.

3.20 WILDFIRE

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

3.20.1 Environmental Setting

The project site is located in the City of Watsonville in an urbanized area. The site is not located in an area designated as a Very High Fire Hazard Severity Zone (CAL FIRE 2022). The nearest areas with a Very High Fire Hazard Severity Zone designation is located south of the site near Strawberry Road, approximately six miles south of the project site and areas six miles to the east of the site near Aromas and along the border of Santa Cruz and Santa Clara Counties, also approximately six miles to the east of the site.

3.20.2 Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, implementation of the project would have a significant impact related to wildfire if it would:

For projects located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones, the proposed project would have an impact related to wildfire if it would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan;

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

3.20.3 Impact Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (a through d). As discussed in the Environmental Setting section provided above, the project site is not located in a very high fire hazard severity zone. The nearest such zone is located six miles to the south and east of the project site.

3.20.4 References

California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone Viewer. Accessed July 19, 2022 at https://egis.fire.ca.gov/FHSZ/.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

3.21.1 Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. As discussed in the previous sections of this Initial Study, the proposed project would not degrade the quality of the environment with the implementation of the identified mitigation measures. As discussed in Section 3.4 Biological Resources, with implementation of the identified mitigation measures (BIO-1a through 1j, BIO-2a through -2b, BIO-3, and BIO-4), the project would not significantly impact sensitive habitats or species. As discussed in Section 3.5 Cultural Resources and Section 3.18 Tribal Cultural Resources, with implementation of the identified mitigation measures (CUL-1, -2, -3 and -4, and TRI-1), the project would result in a less than significant impact on archaeological, historic, and tribal cultural resources.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Using this definition, a project that has no impact in a given impact category cannot have a cumulatively considerable contribution because its contribution is zero.

The project evaluated in this Initial Study is limited to the construction of a warehouse facility. Due to the nature of this proposed project, many types of impacts that are frequently associated with other types of development projects (e.g., housing, offices, commercial uses, etc.) would not occur. For example, as described in Chapter 3 of this Initial Study, construction of the proposed warehouse facility would have no adverse impacts on forestry resources, mineral resources, population and housing, and wildfire.

There is another warehouse facility project in the vicinity that was entitled on April 11, 2023. It is an approximately 155,847-square foot industrial warehouse facility on the 11.5-acre property at 200 Manabe Ow Road, which is located directly adjacent to the subject project to the west. The anticipated construction schedule for this new project at 200 Manabe Ow Road (anticipated to be complete by July 2024) would have some overlap with the subject project.[19] The most intensive construction impacts of the proposed project (grading, trenching and other ground disturbing activities) would likely be completed after the start of construction of the other project, therefore, the identified short-term construction related impacts of the project (e.g., dust, potential soil contamination, noise and vibration, nesting bird disturbance, and water quality) would not combine with the impacts of the other project and would not be cumulatively considerable. Furthermore, the mitigation measures and/or Standard Permit Conditions included in the subject project to reduce construction-related impacts to a less than significant level are also required of the other project.

The two warehouse projects would have similar operational impacts related to air quality and greenhouse gas emissions. Cumulative impacts of these issues were addressed in Chapters 3.1 and 3.8, respectively. For air quality, it was determined that the subject project would not result in operational emissions that exceed the MBARD's operational criteria air pollutant emission thresholds, with the calculated emissions falling far short of the thresholds. The cumulative operational air quality impacts of the subject project and the adjacent warehouse project, which would be expected to generate a similar quantity of emissions, would be less than significant.

[19] California Ventures, Personal Communication to Matt Orbach, February 15, 2023.

Greenhouse gas emission impacts are cumulative by nature and were determined in Chapter 3.8 to be less than significant.

As described in Section 3.4 Biological Resources, the project could affect sensitive biological resources in both the short- and long-term. These impacts, however, would not result in a cumulatively significant loss of such resources, as the Biological Resources Report prepared for the project also included the adjacent property on which the future warehouse project is proposed. The project would implement a number of mitigation measures to reduce impacts on common and special-status species on both project sites, as described in Chapter 3.4. Therefore, the project would not contribute to cumulative impacts on biological resources.

The cumulative effects of traffic noise, which is the only noise source associated with the proposed warehouse use, is addressed in Chapter 3.13 and was determined to be less than significant. Although traffic operational issues are not considered CEQA issues for the purpose of determining significant impacts, the traffic operational analysis in Chapter 3.17 included the adjacent warehouse project in its Cumulative Plus Project scenario analysis. The traffic operational issues are discussed for the purpose of identifying operational deficiencies and recommended improvements only.

Other than the warehouse project on the adjacent property, there are no planned or proposed developments in the project area that could contribute to cumulative aesthetic, air quality, biological resources, hydrology and water quality, public services, or utilities and service systems impacts. The project's cultural, tribal cultural, and biological resources impacts are applicable to the proposed project site as well as to the adjacent project site and would not contribute to cumulative impacts elsewhere with the proposed mitigation measures. Cumulative impacts to aesthetics, hydrology and water quality, public services, or utilities and service systems would not be expected to be significant, as the proposed project and future adjacent project are located within the Manabe-Ow Business Park Specific Plan Area and would be in conformance with development and performance standards of the Specific Plan.

Based on the discussion above, the project would not result in cumulatively considerable impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include construction-related air quality, hazardous materials, and noise. Implementation of mitigation measures identified in Chapter 3, however, would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified.

Chapter 4. List of Preparers

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