

TECHNICAL MEMORANDUM

To: Matt Orbach, Principal Planner
From: Rita Garcia, Environmental Project Manager
Date: September 25, 2024
Subject: City of Watsonville 2023-2031 Housing Element CEQA Determination

INTRODUCTION

This Technical Memorandum evaluates the City of Watsonville 2023-2031 Housing Element (“2023-2031 Housing Element” or “the Project”) concerning California Environmental Quality Act (CEQA) compliance. This Technical Memorandum was prepared to present: 1) the findings of the CEQA compliance review, as described below; and 2) the recommendations concerning the appropriate CEQA compliance documentation.

STATUTORY AUTHORITY AND REQUIREMENTS

Once it has been determined that an activity is a project subject to CEQA, it is then determined whether the project is exempt from CEQA.

State CEQA Guidelines Section 15061 – Review for Exemption

Pursuant to State CEQA Guidelines Section 15061, a project is exempt from CEQA if:

- 1) The project is exempt by statute (see State CEQA Guidelines Article 18, commencing with §15260).
- 2) The project is exempt pursuant to a Categorical Exemption (CE) (see State CEQA Guidelines Article 19, commencing with §15300) and the application of that CE is not barred by one of the exceptions set forth in State CEQA Guidelines Section 15300.2.
- 3) The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.
- 4) The project will be rejected or disapproved by a public agency.
- 5) The project is exempt pursuant to the provisions of Article 12.5 - Exemptions for Agricultural Housing, Affordable Housing, and Residential Infill Projects.

State CEQA Guidelines Section 15262 – Feasibility and Planning Studies

Pursuant to State CEQA Guidelines Section 15262, a project involving only feasibility or planning studies for possible future actions which the agency board or commission has not approved, adopted, or funded does not require the preparation of an EIR or Negative Declaration but does require consideration of environmental factors is exempt from CEQA.

State CEQA Guidelines Section 15283 – Housing Needs Allocation

Pursuant to State CEQA Guidelines Section 15283, CEQA does not apply to regional housing needs determinations made by the Department of Housing and Community Development, a council of governments, or a city or county pursuant to Government Code Section 65584.

PROJECT DESCRIPTION

The Housing Element is a state-mandated chapter of the Watsonville General Plan that establishes the City of Watsonville’s (“City”) official housing policies and programs to accommodate the Regional Housing Needs Allocation (RHNA) goals, as determined by the Association of Monterey Bay Area Governments (AMBAG). The Housing Element identifies and analyzes the City’s housing needs and includes a detailed outline and work program of the City’s goals, priorities, and quantified objectives to develop housing. The Housing Element also addresses the maintenance and expansion of the City’s housing supply to accommodate households currently living and expected to live in Watsonville in the housing cycle. For the 6th Cycle (2023-2031) planning period, AMBAG allocated 2,053 housing units to the City, apportioned by the following income categories: 283 units affordable to very low-income households; 186 units affordable to low-income households; 521 units affordable to moderate-income households; and 1,063 units affordable to above-moderate (market-rate) income households.

The proposed Housing Element represents the City’s policy program for the 6th Cycle 2023-2031 planning period. The 2023-2031 Housing Element is a comprehensive review and update to the previous Housing Element, which covered the 5th Cycle 2015-2023 planning period. The proposed Housing Element is comprised of two Chapters (i.e., Introduction and Housing Plan) and seven Appendices (i.e., Review of Past Performance, Housing Needs Assessment, Housing Resources, Housing Constraints, Fair Housing Analysis, Sites Analysis, Community Outreach, and Glossary).

The Housing Plan addresses the City’s identified housing needs, including housing Goals, Policies, and Programs, and discusses the City’s approach to addressing its share of the regional housing need. The Housing Element includes an Adequate Sites Analysis, which the City conducted to satisfy their RHNA allocation. The identified housing sites represent the City’s ability to accommodate housing at the designated income levels within the 2023-2031 planning period. To accommodate the City’s 2023-2031 RHNA, a comprehensive review of opportunity sites was evaluated. The following types of sites were identified: projects in the pipeline, accessory dwelling units (ADUs), undeveloped 5th Cycle Housing Element sites, sites within the Downtown Watsonville Specific Plan, existing vacant residential land, and future housing opportunity sites. The City’s potential development capacity totals 2,635 units on 69 sites throughout the City, which includes 512 units currently within the planning process (projects in the pipeline), 184 ADUs, and 1,939 units of existing capacity (based on existing General Plan land use and zoning). The Housing Plan shows the City has the capacity to meet its 2023-2031 RHNA allocation through the above-identified methods, with a surplus of 581 units (28 percent surplus).¹

The Housing Plan includes Goals, Policies, and Housing Programs intended to: preserve, conserve, and improve affordable housing stock and neighborhoods; promote the production of a diversity of housing types; assist in the provision of affordable housing; remove or mitigate constraints to housing investment;

¹ City of Watsonville. (2024). Watsonville Housing Element Table F-2: Summary of RHNA Status and Sites Inventory. Watsonville, CA: City of Watsonville.

and promote equal housing opportunity. The Project does not propose to implement or result in housing development. Additionally, the Project does not propose to implement any Housing Program that could have a significant effect on the environment or that was not previously analyzed in a CEQA document.

FINDINGS CONCERNING CEQA COMPLIANCE/CEQA EXEMPTION

Kimley-Horn has completed the Project's CEQA compliance review, as discussed below.

Exemption Justification

The Project proposes an update to the City's Housing Element and includes Goals, Policies, and Housing Programs to meet the City's 6th Cycle RHNA allocation. **Attachment A: Watsonville 2023-2031 Housing Element Program Review Matrix** summarizes the 2023-2031 Housing Element Housing Programs, compares these to the 2015-2023 Housing Element Housing Programs, and provides summary findings concerning their potential to have a significant effect on the environment. As concluded in **Attachment A**, the proposed Housing Programs could not have a significant effect on the environment.

As proposed, the Housing Element would not result in any direct or indirect physical changes to the environment. All future proposed housing development projects submitted to the City will be reviewed pursuant to CEQA, when required, concurrent with other permitting and regulatory requirements. The Housing Element is a policy document and does not provide entitlements to any specific land use projects. Any future policy changes and implementation of Housing Programs will be evaluated for CEQA compliance prior to adoption of any such changes or implementation. The 2023-2031 Housing Element does not make any changes to the 2005 General Plan land use map and does not modify any land use designations, or allowed densities or intensities currently established in the 2005 General Plan. The 2023-2031 Housing Element neither entitles, proposes, nor otherwise requires the construction of new development or rehabilitation of existing development, nor does it change the rate or location of new development. Future housing development pursuant to the 2023-2031 Housing Element would be subject to compliance with the established regulatory framework, namely federal, state, regional, and local laws, ordinances, and regulations, including the General Plan policies, Municipal Code standards, and Standard Conditions of Approval. While by-right housing projects may be exempt from CEQA, all future housing development pursuant to the 2023-2031 Housing Element would be subject to compliance with the established regulatory framework, which can include supporting technical reports.

As is evidenced by the analysis presented in **Attachment A**, and given the nature and scope of the proposed Project as discussed above, it can be seen with certainty that the proposed Project would not have a significant effect on the environment. As such, the Project qualifies as being exempt from CEQA under the common sense exemption pursuant to State CEQA Guidelines Section 15061(b)(3). Additionally, the Housing Element is exempt pursuant to State CEQA Guidelines Section 15262 because it is a feasibility or planning study for possible future actions by the City and is exempt pursuant to State CEQA Guidelines Section 15283 as an action to implement a regional housing needs determination. Therefore, it has been determined that a Notice of Exemption is the appropriate CEQA documentation.

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
Goal 1: Improve, conserve, and preserve both the safe condition of and the continued availability of Watsonville’s existing affordable housing stock to meet the needs of all economic segments of the community.				
Program 1: Code Enforcement	Program A.1: Code Enforcement		X	This Program, which is a continuation of the existing Program, addresses the City’s use of code enforcement as a means to ensure that the character and quality of neighborhoods is enhanced or maintained. This Program does not implement or result in direct housing development. Rather, this Program involves bringing substandard dwelling units into compliance with City Code building, housing, and property maintenance standards. Therefore, this Program would not have a significant effect on the environment.
Program 2: Housing Rehabilitation Loans	Program A.2: Housing Rehabilitation Loans		X	This Program, which is a continuation of the existing Program, addresses the City’s home rehabilitation loan programs that are aimed at strengthening the City’s Code enforcement efforts and improving neighborhoods. This Program does not implement or result in direct housing development. Rather, this Program involves advertising the availability of this program through bilingual brochures at City Hall, in the City’s bilingual newsletter, and posting on the City’s website, and continuing to seek funding opportunities to support the program. Therefore, this

Watsonville 2023-2031 Housing Element Update Review Matrix

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				Program would not have a significant effect on the environment.
Program 3: Preservation of Affordable Housing	Program A.3: Preservation of Affordable Housing		X	This Program, which is a continuation of the existing Program, addresses the City's need to preserve its affordable housing stock. This Program does not implement or result in direct housing development. Rather, this Program addresses the City's commitment to provide technical assistance through nonprofit and for-profit partnerships to help prevent affordable units from converting to market-rate. Therefore, this Program would not have a significant effect on the environment.
Program 4: Mobile Home Park Conservation Ordinance	Program A.4: Mobile Home Park Conservation Ordinance		X	This Program, which is a continuation of the existing Program, addresses the City's implementation of the Mobile Home Park Conversion and Rent Stabilization Ordinance. This Program does not implement or result in direct housing development. Rather, this Program involves reaching out to mobile home park communities and hosting a workshop to discuss their specific housing needs. Therefore, this Program would not have a significant effect on the environment.
-	Program A.5: Replacement Housing	X		This Program addresses the City's efforts to adopt replacement housing requirements in their Municipal Code to

Watsonville 2023-2031 Housing Element Update Review Matrix

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				<p>ensure replacement/reconstruction of any units occupied by lower income households or households subject to affordability requirements in the last five years that are demolished. This Program does not implement or result in any direct housing development. Rather, this Program outlines the City’s objective to formulate replacement housing program requirements and amend the Municipal Code. Therefore, this Program would not have a significant effect on the environment. Any housing development facilitated by this Program would be subject to the established regulatory framework, including the City’s developmental review and plan check process.</p>
-	<p>Program A.6: Displacement Protection</p>	X		<p>This Program relates to the City’s understanding that new developments can increase the risk of displacement, especially for sensitive populations. This Program does not implement or result in any direct housing development. Rather this Program addresses the City’s objectives to apply for at least one grant per year that is focused on improving community assets and consider anti-displacement policy options, programs, or Code amendments. Therefore, this</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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				Program would not have a significant effect on the environment.
Goal 2: Expand and protect housing opportunities for all economic segments and special needs groups within the community.				
Program 5: First Time Home Buyer Loans	Program B.1: First Time Home Buyer Loans		X	This Program, which is a continuation of the existing Program, addresses the City's efforts to provide home purchase loans for eligible first-time homebuyers. This Program does not implement or result in direct housing development and is primarily informational in nature. Therefore, this Program would not have a significant effect on the environment.
Program 6: Down Payment Assistance Loans	Program B.2: Down Payment Assistance Loans		X	This Program, which is a continuation of the existing Program, addresses the City's efforts to offer down payment assistance loans to homebuyers to purchase affordable homes and provide more homeownership opportunities to residents. This Program does not implement or result in direct housing development. Rather, this Program involves advertising the availability of this Program through bilingual brochures at City Hall, in the City's bilingual newsletter, and posting on the City's website, conduct bilingual community workshops, continue promoting the program through lenders, realtors, the Board of Realtors and other housing professionals. Therefore, this

Watsonville 2023-2031 Housing Element Update Review Matrix

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				Program would not have a significant effect on the environment.
Program 7: Section 8 Rental Assistance	Program B.3 Housing Choice Voucher (HCV) Rental Assistance		X	This Program, which modifies the existing Program, addresses the City’s efforts to continue to provide residents with information regarding the availability of the Section 8 Housing Choice Voucher Program. This Program does not implement or result in direct housing development and is primarily informational in nature. Therefore, this Program would not have a significant effect on the environment.
Program 8: Relocation Assistance Ordinance	Program B.4: Relocation Assistance Ordinance		X	This Program, which is a continuation of the existing Program, addresses the City’s continued implementation of the Relocation Assistance Ordinance. This Program does not implement or result in direct housing development. Rather this Program involves requiring landlords to pay relocation benefits to tenants who are displaced from dangerous buildings. Therefore, this Program would not have a significant effect on the environment.
Program 9: Child Care Assistance	Program B.5: Child Care Assistance		X	This Program, which is a continuation of the existing Program, addresses the City’s support of projects offering childcare by permitting child (day) care homes as an accessory use in all residential zones. This Program does not entitle or automatically

Watsonville 2023-2031 Housing Element Update Review Matrix

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				<p>permit new construction. Rather, this Program identifies as a City objective to amend the Municipal Code to allow child day care homes by-right in all residential zoning districts in compliance with Health and Safety Code requirements. No amendments to the Municipal Code are proposed as part of this Program. Therefore, this Program would not have a significant effect on the environment.</p>
<p>Program 10: Application for Grants and Loans</p>	<p>Program B.6: Application for Grants and Loans</p>		<p>X</p>	<p>This Program, which is a continuation of the existing Program, addresses monitoring the City’s success in applying for grants and loan programs and its continued efforts to investigate potential funding sources. This Program does not implement or result in direct housing development. Rather, this Program investigates funds available under Propositions 46 and 1C and other affordable housing programs, and directs City to pursue those that help meet the housing needs of the City’s residents. Therefore, this Program would not have a significant effect on the environment.</p>
	<p>Program B.7: Promotion of Resources for Large Households</p>	<p>X</p>		<p>This Program address the City’s intent to support efforts that provide resources to help ease the burden of large households. This Program does not implement or result in direct housing development.</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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				Rather, this Program encourages the establishment of resources that help meet the large household housing needs of the City’s residents. Therefore, this Program would not have a significant effect on the environment.
	Program B.8: Promotion of Resources for Female-Headed Households	X		This Program addresses the City’s intent to support efforts that provide resources to help ease the burden of female-headed households. This Program does not implement or result in direct housing development. Rather, this Program encourages the establishment of resources that help meet the female-headed household housing needs of the City’s residents. Therefore, this Program would not have a significant effect on the environment.
Goal 3: Provide housing opportunity for Watsonville’s share of the regional housing need for all income and special needs groups.				
Program 11: Adequate Sites Program	Program C.1: Adequate Sites Program		X	This Program, which is a continuation of the existing Program, continues the City’s maintenance of a current inventory of vacant and underutilized lands suitable for residential development to ensure adequate capacity to meet the RHNA during the planning period. This Program does not implement or result in direct housing development. Rather, this Program continuously maintains an inventory of adequate housing sites

Watsonville 2023-2031 Housing Element Update Review Matrix

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				throughout the Housing Element Planning Period and makes it available on the City’s website. Therefore, this Program would not have a significant effect on the environment.
	Program C.2: Explore Additional Residential Opportunity Sites	X		This Program addresses the City’s intent to comply with the provisions of AB 2011 and SB 6 by adopting implementing Ordinances for AB 2011 and SB 6 requirements and establishing a ministerial processing procedure for AB 2011 eligible projects. The Ordinances will: contain all required site criteria; development standards and project criteria; affordable housing requirements; prevailing wage; and other labor requirements. This Program does not implement or result in direct housing development. Rather, this Program addresses potential AB 2295, AB 2011, SB 6, and SB 4 sites and the City’s intent to adopt Municipal Code amendments, as needed, within four years of Housing Element adoption. Therefore, this Program would not have a significant effect on the environment.
	Program C.3: SB 330 Compliance	X		This Program addresses the City’s need to comply with state law enacted through Senate Bill 330 and prohibit General Plan amendments or zoning changes if they

Watsonville 2023-2031 Housing Element Update Review Matrix

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				<p>would reduce residential capacity compared to the land use designation/zoning district in effect as of January 1, 2018, without concurrent upzoning of equal capacity elsewhere in the City. This Program does not implement or result in any direct housing development. Rather, this Program supports the City’s goal to maintain consistency with state housing law. Therefore, this Program would not have a significant effect on the environment.</p>
<p>Program 12: Affordable Housing Ordinance</p>	<p>Program C.4: Affordable Housing Ordinance</p>		<p>X</p>	<p>This Program, which is a continuation of the existing Program, addresses the City’s efforts to implement the Affordable Housing Ordinance to ensure that the private sector assists in meeting the housing needs of all income groups in the City. This Program does not implement or result in any direct housing development. Rather, this Program supports the City’s goal and conducts annual progress reports of units constructed through the Ordinance. Any housing development facilitated by the Ordinance would be subject to the established regulatory framework, including the City’s developmental review and plan check process. Therefore, this Program would not have a significant effect on the environment.</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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Program 13: Partnership with Non-Profit Housing Agencies	Program C.5: Partnership with Non-Profit Housing Agencies		X	This Program, which is a continuation of the existing Program, addresses monitoring the City’s ongoing success in granting direct financial assistance, land write-downs, regulatory incentives, and other forms of assistance to developers to provide both ownership and rental housing to lower- and moderate-income households. This Program does not implement or result in direct housing development. Rather, this Program seeks, and applies for, funding opportunities to continue the City’s efforts in granting financial assistance, land write-downs, regulatory incentives, and/or other forms of assistance to non-profit developers of affordable and special needs housing citywide. Therefore, this Program would not have a significant effect on the environment.
Program 14: Mixed-Use Development	Program C.6: Encourage Mixed-Use Development Opportunity in Commercial Areas		X	This Program, which is a continuation of the existing Program, addresses the City’s continued encouragement of redevelopment of underutilized commercial areas to a mixed-use that includes housing to establish a range of housing types and affordability that are near employment opportunities and amenities, and contribute to a safe and inclusive community. This Program does not implement or result in direct housing

Watsonville 2023-2031 Housing Element Update Review Matrix

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				<p>development. Rather, this Program addresses the City’s goals of offering financial, technical, and/or other incentives or assistance to facilitate mixed-use developments that include housing and encourage higher densities for residential uses in commercial zones. Any mixed-use development facilitated by this Program would be subject to the established regulatory framework, including the City’s developmental review and plan check process. Therefore, this Program would not have a significant effect on the environment.</p>
<p>Program 15: Transitional Housing and Emergency Shelters</p>	<p>Program C.7: Transitional Housing and Emergency Shelters</p>		<p>X</p>	<p>This Program, which is a continuation of the existing Program, addresses the City’s intent to comply with California Government Code Section 65583(c)(3). This Program does not implement or result in direct housing development. Rather, this Program addresses the City’s intent to update the Code’s definition of emergency shelter housing and adopt a Zoning Ordinance amendment to permit transitional housing in all residential zoning districts under the same restrictions as other residential dwellings of the same type in the same zone. Therefore, this Program would not have a significant effect on the environment.</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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Program 15: Transitional Housing and Emergency Shelters	Program C.8: Supportive Housing		X	This Program, which modifies an existing Program, addresses the City's intent to comply with California Government Code Sections 65583(c)(3) and 65651(a) (AB 2162). This Program does not implement or result in direct housing development. Rather, this Program addresses the City's intent to establish a monitoring program to maintain an inventory of sites appropriate to accommodate transitional and supportive housing and solicit input from organizations who specialize in addressing the needs of persons experiencing homelessness and extremely low-income households. Therefore, this Program would not have a significant effect on the environment.
	Program C.9: Low-Barrier Navigation Centers	X		This Program addresses the City's compliance with Senate Bill 48. This Program does not implement or result in direct housing development. Rather, this Program addresses the City's intent to amend the Zoning Ordinance to include procedures and regulations to process low-barrier navigation centers in compliance with State law by June 2026. Therefore, this Program would not have a significant effect on the environment.
	Program C.10: Water and Sewer Providers	X		This Program addresses the City's compliance with California Government

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				Code Section 65589.7 in forwarding the Housing Element, and any amendments, to local water and sewer service providers. This Program does not implement or result in direct housing development. Rather this Program addresses the City’s compliance with the requirement to forward the adopted 2023-2031 Housing Element to local water and sewer service providers, and any amendments thereto. Therefore, this Program would not have a significant effect on the environment.
	Program C.11: SB 35 Streamlining	X		This Program addresses the City’s compliance with SB 35, which requires local jurisdictions to provide a streamlined ministerial approval process for eligible multi-family residential developments, subject to objective zoning and design review standards. This Program does not implement or result in direct housing development. Rather, this Program addresses the City’s intent to establish streamlining procedures and objective standards for qualifying projects under SB 35. Therefore, this Program Action would not have a significant effect on the environment.
	Program C.12: Surplus Land Act	X		This Program addresses the Surplus Lands Act (SLA) (California Government Code

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				Section 54220 et. seq.) and AB 1486 (2019), which require the City to declare property to be “surplus land” before the City can take any action (sale or lease) to dispose of the property. This Program does not implement or result in direct housing development. Rather, this Program aids in the City’s efforts to make acquiring sites for affordable housing more accessible to developers. Therefore, this Program would not have a significant effect on the environment.
Goal 4: Where appropriate, mitigate unnecessary governmental constraints to the maintenance, improvement, and development of housing.				
Program 16: Density Bonus Ordinance	Program D.1: Density Bonus Ordinance		X	This Program, which is a continuation of the existing Program, addresses the City’s efforts to adjust to California Government Section 65915 (State Density Bonus Law) amendments and changes. This Program does not implement or result in direct housing development. Rather, this Program reviews current Municipal Code provisions to ensure consistency with State law. Therefore, this Program would not have a significant effect on the environment.
Program 17: Planned Development District (PD)	Program D.2: Planned Development District (PD)		X	This Program, which is a continuation of the existing Program, addresses monitoring the City’s success of using the PD land use designation to facilitate

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				<p>greater housing affordability by approving small-lot single-family homes and rental projects. This Program does not implement or result in direct housing development. Rather, this Program continues the City’s offering of the PD land use designation as an option for developers to create more tailored residential projects. Any housing development facilitated by the Ordinance would be subject to the established regulatory framework, including the City’s developmental review and plan check process. Therefore, this Program would not have a significant effect on the environment.</p>
<p>Program 18: Design Review Process</p>	<p>Program D.3: Design Review Process</p>		<p>X</p>	<p>This Program, which is a continuation of the existing Program, addresses the City’s review of the existing Livable Community Residential Design Guidelines. These Guidelines help clarify the City and Community’s expectations of a project’s design and ensure that developments are consistent with General Plan policies. This Program does not implement or result in direct housing development. Rather, this Program involves updating and enforcing the City’s Design Review process and the Residential Design Guidelines to provide objective design standards. Therefore,</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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				this Program does not have a significant effect on the environment.
Program 19: Accessory Dwelling Unit Ordinance	Program D.4: Accessory Dwelling Units and Junior Accessory Dwelling Units		X	This Program, which modifies the existing Program, addresses the City’s goal of encouraging the development of accessory dwelling units (ADU) and junior accessory dwelling units (JADU). This Program does not implement or result in direct housing development. Rather, this Program addresses the City’s intent to maintain compliance with State housing laws for ADUs and JADU’s, as well as support their development citywide by offering permit-ready ADU and JADU plans and establishing a user’s guide to assist applicants in the ADU/JADU entitlement process. Therefore, this Program would not have a significant effect on the environment.
Program 22: Housing for Disabled Persons	Program D.5: Reasonable Accommodations		X	This Program, which modifies an existing Program, addresses Government Code Section 65583 and the Fair Housing Act (1988). This Program does not implement or result in direct housing development. Rather, this Program addresses the City’s intent to adopt reasonable accommodation procedures and maintain updated information on reasonable accommodations on the City’s website and at City Hall. Therefore, this Program

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				would not have a significant effect on the environment.
	Program D.6: Definition of Family	X		This Program addresses the City’s Zoning Ordinance’s lack of definition of “Family.” This Program does not implement or result in direct housing development. Rather, this Program intends to amend the Zoning Ordinance to include a definition of “Family,” which meets State requirements by 2025. Therefore, this Program would not have a significant effect on the environment.
Program 20: Zoning Ordinance Update	Program D.7: Zoning Ordinance Update Addressing Development Constraints for Affordable Housing		X	This Program, which modifies the existing Program, addresses the Housing Element’s constraints analysis, which identified multifamily parking requirements as a potential constraint to housing development. This Program does not implement or result in direct housing development. Rather, this Program involves public outreach to identify constraints to parking standards and gain input on Zoning Ordinance amendments, which is intended to occur no later than June 2026. Therefore, this Program would not have a significant effect on the environment.
	Program D.8: Permit 50 Percent Residential Use in	X		This Program addresses the City’s intent to permit 50 percent residential use at identified sites in the City’s Downtown

Watsonville 2023-2031 Housing Element Update Review Matrix

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	Downtown Central Core Area			Watsonville Specific Plan (DWSP) area. This Program does not implement or result in direct housing development. Rather, this Program intends to amend the Zoning Ordinance, to allow DWSP requirements to change by June 2024. Therefore, this Program would not have a significant effect on the environment.
	Program D.9: Zoning Ordinance Update to Allow Residential Care Facilities of 7 or More Persons	X		This Program addresses recent provisions of State Law, which require jurisdictions to permit residential care facilities administratively. This Program does not implement or result in direct housing development. Rather, this Program addresses the City's intent to update and amend the City's Zoning Ordinance by June 2024 to allow development of residential care facilities through administrative review. Therefore, this Program would not have a significant effect on the environment.
	Program D.10: Manufactured Homes	X		This Program reviews existing manufactured homes provisions and development standards for consistency with State law in accordance with Government Section 65852.3. This Program does not implement or result in direct housing development. Rather, this Program addresses the City's intent to amend the Municipal Code by June 2025

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				to allow, by-right, manufactured homes in all residential zones that allow single-family residential units. Any future housing development facilitated by this Ordinance change would be subject to the established regulatory framework regarding environmental review and the City’s development review and plan check process. Therefore, this Program would not have a significant effect on the environment.
	Program D.11: Lot Consolidation	X		This Program addresses the City’s identified adequate sites that are adjacent to one another – some with common ownership- and how to develop underutilized lots to their fullest potential. This Program does not implement or result in direct housing development. Rather, this Program addresses the City’s goal to facilitate consolidation of non-vacant, underutilized sites and will evaluate the appropriateness of various incentives and provide this information to developers and other interested parties through the City’s website and at City Hall. Therefore, this Program would not have a significant effect on the environment.
	Program D.12: Development Community Outreach	X		This Program addresses the City’s goal of providing timely and transparent development review processes in

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				<p>facilitating housing development. This Program does not implement or result in direct housing development. Rather, this Program seeks to coordinate annual outreach efforts and meetings with the development community to discuss and address potential barriers to development of alternative housing types and use that information to adopt General Plan policy or Municipal Code changes that facilitate the production of alternative housing types. Therefore, this Program would not have a significant effect on the environment.</p>
	<p>Program D.13: Building Height Limits</p>	<p>X</p>		<p>This Program addresses the City’s goal to improve the Downtown Watsonville Specific Plan (DWSP). This Program intends to amend the DWSP to change the Downtown Neighborhood and Downtown Industrial zoning districts four-story height limit to six stories and the Downtown Core zoning district six-story height limit to eight stories. This Program does not grant any permits or guarantee any future housing development. Any future housing development facilitated by this Program would be subject to the established regulatory framework regarding environmental review and the City’s development review and plan check process. Therefore, this Program would</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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				not have a significant effect on the environment.
Goal 5: Ensure fair and equal housing opportunity for all persons regardless of race, religion, sex, marital status, family type, ancestry, national origin, color, or other protected status.				
Program 21: Fair Housing Program	Program E.1: Fair Housing Program		X	This Program, which is a continuation of the existing Program, addresses the City’s support of equal opportunity lending programs and non-discriminatory practices in selection of residents for participation in the City’s housing assistance programs. This Program does not implement or result in direct housing development. Rather, this Program continues City efforts to support the State Office of Fair Employment and Housing, CRLA, and equal opportunity lending programs. as Additionally, to continue to support efforts by the Housing Authority and other agencies to list units accessible to disables persons. Therefore, this Program Action would not have a significant effect on the environment.
Program 22: Housing for Disabled Persons	Program E.2: Housing for Persons with Physical Disabilities		X	This Program, which modifies the existing Program, addresses the City’s continued collaboration efforts with nonprofit housing partners to facilitate housing units accessible to persons with physical disabilities and a barrier free environment. This Program does not implement or result in direct housing

Watsonville 2023-2031 Housing Element Update Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Update/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				development. Rather, this Program intends to create and promote informational materials on housing accessibility, rehabilitation, and maintenance resources by 2025-2026. This Program also intends to adopt accessibility programs focused on improving access to housing, transit, public buildings and facilities, sidewalks, pedestrian crossings, and businesses. Therefore, this Program would not have a significant effect on the environment.
Program 23: Special Needs Housing	Program E.3: Housing for Persons with Developmental Disabilities		X	This Program, which modifies the existing Program, addresses the City's efforts to accommodate residents with developmental disabilities. This Program does not implement or result in housing development. Rather, this Program addresses the City's goal to seek out State and federal funding and collaborate with housing developers and local organizations to identify needs and resources and help support and encourage construction and rehabilitation of housing with supportive services for persons with developmental disabilities. Therefore, this Program would not have a significant effect on the environment.
	Program E.4: Affirmatively Further Fair Housing	X		This Program addresses the City's efforts to affirmatively further fair housing by

Watsonville 2023-2031 Housing Element Update Review Matrix

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				<p>taking meaningful actions that foster inclusive communities free from barriers, which restrict access to opportunities based on protected classes, as defined by State law (AB 686). This Program does not implement or result in direct housing development. Rather, this Program involves the City’s collaboration with the Housing Authority to promote public infrastructure and assist lower-income households in finding housing, purchasing, and/or renting housing. Therefore, this Program would not have a significant effect on the environment.</p>
	<p>Program E.5: Energy Conservation</p>	<p>X</p>		<p>This Program addresses the City’s goal to encourage the development of affordable housing units that use alternative energy, low energy demand appliances, passive and solar heating, and other appropriate methods and provide in-kind assistance to developers to pursuing funding to incorporate into development projects. This Program is also intended to enforce energy conservation requirements prescribed in the California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code (CBSC), and Title 24 Part 11 California Green Building Standards (CALGreen). This Program does not implement or result in direct housing development.</p>

Watsonville 2023-2031 Housing Element Update Review Matrix

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				Rather, this Program increases public awareness and information on energy conservation opportunities and assistance programs for new and existing residential units and complies with State energy conservation requirements. Therefore, the Program would not have a significant impact on the environment.
	Program E.6: Farmworker and Workforce Housing	X		This Program addresses the City’s intent to update applicable Municipal Code sections to comply with provisions for farmworker and workforce housing in compliance with the Employee Housing Act (California Health and Safety Code Sections 17000-17062.5). This Program Action does not implement or result in direct housing development. Rather, this Program, addresses the City’s intent to comply with agricultural and employee housing requirements by December 2025. Therefore, this Program would not have a significant impact on the environment.
	Program E.7: Environmental Justice Element	X		This Program addresses the City’s intent to incorporate an environmental justice component to the 2050 General Plan Update. This Program Action does not implement or result in direct housing development. Rather, this Program addresses the City’s intent to incorporate environmental justice objectives, policies,

Watsonville 2023-2031 Housing Element Update Review Matrix

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				and programs to the 2050 General Plan Update, and to adopt by December 2026. Therefore, this Program would not have a significant effect on the environment.